

Final Environmental Impact Statement Highwood Generating Station

Appendix L Comments and Agencies' Responses to Comments

January 2007

This document (Appendix L of the FEIS) contains the public's comments and the agencies' responses to those comments on the Draft EIS and revised draft air quality permit for the proposed Highwood Generating Station. Please review the following suggestions for using these comments and agencies' responses to comments.

There are three tables to facilitate your access to Appendix L. The first table, Table L-3, lists the categories and codes for the comments – for example Alternatives, ALT-305, Integrated Gasification Combined Cycle (IGCC). The second table, Table L-4, lists the commenters by name in alphabetical order and provides a comment ID number (C#) for each person or organization. The third table, Table L-5, lists the commenters in numerical order.

A commenter is anyone who submitted written comments (hard or electronic copy) in a personal letter, email, a form letter, or a postcard, and/or presented testimony at either the Great Falls or Havre hearing on the Draft EIS and draft air quality permit. For each person or organization, there is a listing of the comment numbers where that person's or organization's comments can be found; for example 200-33 means the 33rd comment in the category section PUR-200, Purpose and Need. Federal, state, local and tribal agency comment ID numbers are included in the listings. When reviewing the comments, you can locate your ID number to see which of your comments was included. The third table, Table L-5, lists the commenters in ascending order by ID number. This table is useful when you see an ID number after a comment and wonder who made that comment. You could then go to the third table and see what other comments were made by the same person or agency. Copies of all letters, postcards, and petitions are on file at agency offices and are available for review and can be obtained for the cost of copying and postage.

The agencies are not required to respond to every comment made by every person. However, "all substantive comments received on the draft statement (or summaries thereof where the comments were exceptionally voluminous), should be attached to the final statement whether or not the comment is thought to merit individual discussion by the agency in the text of the statement" (40 CFR 1503.5(b)). Under Montana regulations, a final EIS must include "responses to substantive comments received on the draft EIS" (ARM 17.4.619(1)). If the comment resulted in changes to the EIS text, then it is usually so stated in the response, but not all responses require that the text in the EIS be modified or supplemented. For persons who commented on the document, but whose comments were not considered substantive, the phrase "Thank you for your comment" will be stated. This includes those persons who merely expressed an opinion for or against the project, stated simple editorial comments, or restated portions of the EIS text without stating a specific comment.

Where possible, similar comments are grouped together or have been consolidated into a single comment (therefore, not all comments may be verbatim) and provided with a single response. Some grouped comments may list two or more pages of related comments from numerous people before the response is provided. The more unique and detailed comments usually have their own responses. Often there were overlaps between categories for some comments; each comment was placed in the most appropriate category or split up between several. If you are interested in certain issues, you may need to look at comments and responses in several categories.

Postcards and Petition

In addition to the hundreds of written and oral comments on the DEIS received from individuals, groups, and agencies, thousands of Montana residents signed postcards (both for and against the HGS) and a petition (against the HGS) concerning the project. With the exception of one of the postcards, the names of these signatories are not included in the tables below due to the large number of names as well as the identical comment for which these signatories were expressing their agreement by affixing their names. One postcard supporting the project was distributed, as were one postcard and one petition opposing it. Each is described briefly below.

Yellowstone Valley Electric Cooperative Postcard

Yellowstone Valley Electric, one of the member cooperatives of SME, distributed postcards supporting the HGS to its customers and collected 4,311 signed postcards, which were submitted to DEQ. The postcard reads (italics added):

Statement In Support of the Highwood Generating Station

TO: *The Montana Department of Environmental Quality
The Rural Utilities Service*

- *As a member of Yellowstone Valley Electric Cooperative, I support the construction of the Highwood Generating Station. My electric Cooperative is a part-owner of this power plant project.*
- *The Highwood Generating Station will utilize the best available control technology to limit emissions and will be compliant with State and Federal Air Quality Standards.*
- *The Highwood Generating Station will provide Montana citizens with high paying jobs and will bring positive economic benefits to local and state government.*
- *The Highwood Generating Station will utilize Montana's vast coal resources to bring long-term affordable and reliable electric service to tens of thousands of Montanans.*

I strongly support the construction of the Highwood Generating Station and request the approval of the Southern Montana Electric Generation and Transmission Cooperative Environmental Impact Statement.

Table L-1 is a list of all the names of those individuals and businesses who signed and sent the Yellowstone Valley Electric Cooperative postcard expressing support for the Highwood Generating Station back to the cooperative, which delivered them to the Montana Department of Environmental Quality.

Table L-1. Senders of the Yellowstone Valley Cooperative Postcard in Support of HGS

| Last Name | First Name | Last Name | First Name |
|---------------------------|-------------------|------------------------------|-------------------|
| A & B RESTAURANT | | ALLEN | PAUL G |
| A ALL PURPOSE STORAGE | | ALLEN | ROBERT L |
| A J MINI STORAGE | | ALLEN | GEORGE |
| A-1 JOHNSON AUTO WRECKING | | ALLES | JACK J |
| A-1 LANDSCAPING | | ALLISON | LOYD M |
| A-1 PRORATE SERVICE INC | | ALLISON | ROBERT F |
| AABY | PAUL A | ALLISON | CHARLES R |
| AABY | WILLIAM A | ALLRED | LARRY G |
| AABY | FRANCES | ALLWIN | DENNIS D |
| AALGAARD | LARRY | AL'S MINI STORAGE OF MONTANA | |
| AARON JAMES CONSTRUCTION | | ALTMAN | THOMAS L |
| ABBEY | EARL H | ALVERAZ | JOHN |
| ABEL | JUSTIN | AMADON | ROGER M |
| ABELL | JESSE W | AMANN | ROSELLA A |
| ABELMAN | ALAN K | AMEN | GEORGE W |
| ABY | BART W | AMEN | LUCRETIA A |
| ACCORDINO | FRED W | AMES | MICHELE R |
| ACHTEN | JEFF J | AMIES | VICKY JO |
| ADAIR | LYDA L | ANDERSCH | JIM |
| ADAMS | ALBERT A | ANDERSEN | WAYNE E |
| ADAMS | JOHN L | ANDERSON | SHANE A |
| ADAMS | DENIS L | ANDERSON | DANIEL A |
| ADAMS | JOHN L | ANDERSON | RICHARD K |
| ADAMS | THOMAS F | ANDERSON | PAUL L |
| ADAMSKI | ALEX A | ANDERSON | RONALD W |
| ADOLPH COORS COMPANY | | ANDERSON | ALBERT W |
| AFFLECK | DOUG P | ANDERSON | LORAIN G |
| AGRINOMICS INC | | ANDERSON | JAMES D |
| AHMANN | STEVE | ANDERSON | TED N |
| AIGNER | TODD H | ANDERSON | KATHERINE P |
| AKIN | DEAN H | ANDERSON | R D |
| ALBERS | ALTON C | ANDERSON | BRIAN K |
| ALBERS | ROBERT E | ANDERSON | KEITH D |
| ALBERT | EUGENE A | ANDERSON | DEBRA A |
| ALBRECHT | CORWIN | ANDERSON | JOETTA |
| ALBRECHT | LARRY L | ANDERSON | KRISTINE M |
| ALBRIGHT | GREGORY A | ANDERSON | CONSTANCE J |
| ALDERMAN | VIRGINIA E | ANDERSON | ALLEN |
| ALDINGER | ROGER | ANDREWS | HELEN E |
| ALDINGER | DARRELL | ANGELL | SUSAN |
| ALDRICH | LEONA E | ANITA ANGUS RANCH | |
| ALDRICH | JOHN T | ANKRUM | DANIEL |
| ALLARD | EUGENE | ANS | MARTIN S |
| ALLEN | BERNARD C | ANTHONY | GARY W |
| ALLEN | MARK A | ANTON | STEVE P |
| ALLEN | LLOYD E | ANTTILA | VERN W |
| ALLEN | DENNIS | ARBIZZANI | CHARLES G |

| Last Name | First Name | Last Name | First Name |
|-----------------------|------------|-------------|------------|
| ARCHAMBEAULT | STEVE | BALDRY | DORIS A |
| ARCHER | JAMES M | BALDRY | ALVIE J |
| ARCHER | MICHAEL W | BALES | LORETTA |
| ARCHULETA | LYNN B | BALL | KATHRYN |
| ARD | ROBERT R | BALL | LUCIEN C |
| ARMSTRONG | JAMES L | BALL | DIRK J |
| ARMSTRONG | JEFF J | BALLARD | MEG |
| ARMSTRONG | LARRY M | BALLARD | DOUGLAS F |
| ARMSTRONG | ROBERT E | BALLARD | WILLIAM W |
| ARNESON | OSCAR | BALSTER | JOSHUA K |
| ARNOLD | RICK E | BALZER | RONALD |
| ARNOLD | PHYLLIS R | BALZER | TERRAL |
| ARNOLD | DIRK T | BALZER | DARELENE N |
| ARNOLD | EUGENE C | BALZER | MARVIN A |
| ARNOLD | S CHAD | BANDEROB | ARVIN H |
| ARVAL LTD PARTNERSHIP | | BANGART | TOM |
| ASHLAWN FARMS INC | | BARBER | HENRY J |
| ATCHISON | ALYCE R | BARE | JOHN R |
| ATKINSON | MIKE B | BARGSTADT | STEVE |
| AUREN | NANCY | BARISICH | JUSTIN W |
| AUSTIN | JAMES L | BARKER | ELVIN |
| AUSTIN | BOB | BARKHUFF | RANDY |
| AVERY | CHARLES W | BARKHUFF | VICKI M |
| AZURE | RANDALL P | BARNARD | BEN P |
| B & B TRAILER COURT | | BARNARD | LEONARD W |
| BABCOCK | KEITH | BARNES | ROBERT D |
| BABER | JOHN O | BARNES | KATHLEEN L |
| BABNIK | JOHN | BARNES | BRET |
| BACKER | JANICE E | BARNHART | WILLIAM E |
| BADGETT | JAY | BARNHART | GARY L |
| BADOVINUS | GARY W | BARRICK | DEAN M |
| BAILEY | DELBERT L | BARTA | ALLEN J |
| BAILEY | KATHRYN L | BARTHOLOMEW | BARRY J |
| BAILEY | RICHARD N | BARTHULY | CARL B |
| BAILEY | ALVIN W | BARTHULY | HARRY |
| BAIN-PETERSON | CONNIE I | BARTLETT | CYNTHIA A |
| BAIRD | GUY J | BATO | JOSEPH H |
| BAISCH | DAVID | BAUER | DELVIN E |
| BAKER | DONALD | BAULEY | ROBERT H |
| BAKER | JAMES R | BAUM | JAMEY L |
| BAKER | MIKE J | BAUM | GERALD J |
| BAKER | JASON R | BAUMAN | JAMES C |
| BAKER | ADAM L | BAUMANN | LYLE D |
| BAKER | JIM W | BAUMANN | KENNY W |
| BAKER | JIM W | BAXTER | ROBERT C |
| BAKER | SHIRLEY | BAXTER | ROBERT G |
| BAKER | ERIC T | BAYNE | HENRY |
| BAKKER | STEVE | BAYNE | LINDA S |
| BAKKER | ANNA K | BEACH | ALLAN |
| BAKKER | WILLIAM | BEADLE | DAVID P |
| BALDNER | ROBERT F | BEAR | MELISA M |

| Last Name | First Name | Last Name | First Name |
|----------------|------------|----------------------|------------|
| BEARD | RUTH E | BERAN | MARY ANN |
| BEARD | KENNETH M | BEREA BAPTIST CHURCH | |
| BEARD | JUSTIN L | BERG | RALPH M |
| BEATON | ELIZABETH | BERG | STANLEY C |
| BEATTIE | NORMAN | BERG | ROSS E |
| BEAUMAN | HARRY | BERG | JOHN W |
| BECK | RUSSELL D | BERGENDAHL | EARL H |
| BECK | JOHN W | BERGENDAHL | JON C |
| BECK | LINDA L | BERGER | MARJORIE M |
| BECKER | THOMAS | BERGER | ROD A |
| BECKER | SERINA J | BERGERSON | DARYL G |
| BECKER | RONALD | BERGERSON | BRUCE K |
| BECKER | SHERIDAN O | BERGGREN | RAY F |
| BECKER | PATRICE | BERGLEE | CLIFTON M |
| BECKER | COURTNEY M | BERGLUND | R A |
| BECKER FARMING | | BERGSTROM | DAN T |
| BECKERS | MICHAEL C | BERKNER | BRIAN P |
| BECKERS | JAMES J | BERMES | DONNA M |
| BEDDES | DAVID E | BERMES | JAMES L |
| BEDDES | SPENCER C | BERNHARDT | DONNA A |
| BEDDES | MATTHEW T | BERNHARDT | ROBERT J |
| BEEBE | RHEA L | BERNHARDT | WILLIAM J |
| BEELEER | MARK W | BERTHOUD | WILLIAM |
| BEELEER | LOUIS F | BERTRAND | RICHARD R |
| BEERS | GREG | BERUBE | CRAIG S |
| BEJOT | ARNOLD J | BERUMEN | MITCHELL T |
| BEKEL | LON | BERVE | JIM |
| BELCHER | R HERBERT | BESEL | JOLITTA A |
| BELK | DANIEL J | BESEL | DENNIS L |
| BELL | RANDALL | BESEL | KENNETH R |
| BELL | JOHN | BESEL | ROBERT C |
| BELLE | RICHARD D | BESSELMAN | GERALD M |
| BELLEW | VICKI L | BEST | LES W |
| BELLINGER | RICK | BEST | RICHARD R |
| BELTRAN | IGNACIO P | BEST | DENNIS |
| BENDER | GREG L | BEST | KENNETH H |
| BENDER | DONALD W | BEST PROPERTIES INC | |
| BENGTON | LAWRENCE E | BESTLAND | HOWARD |
| BENNER | JACOB | BESTROM | LEE E |
| BENNER | GARY | BESTROM | LARRY R |
| BENNETT | ROBERT | BETTS | ALLEN A |
| BENNETT | JAMES D | BEVEN | KENNETH M |
| BENNETT | DENNIS | BEVEN | CINDY K |
| BENNETT | CAROL ANN | BEYERS | JAMES |
| BENNETT | KENNETH W | BICKFORD | WARREN R |
| BENSON | JEFF | BICKFORD | DON |
| BENSON | LYNN R | BICKLER | BONITA |
| BENSON | THOMAS L | BIEGEL | KEVIN B |
| BENTLEY | DONALD | BIES | GERALD P |
| BENTON | JEFF L | BIG DITCH COMPANY | |
| BENTZ | DAVE | BIG SKY AIRCRAFT INC | |

| Last Name | First Name | Last Name | First Name |
|-------------------------------|-------------|--------------------------------|------------|
| BIG SKY FLEA MARKET | | BLOOM | WALDI F |
| BIG SKY HOME IMPROVEMENT | | BLUE CREEK VOLUNTEER FIRE DEPT | |
| BIG SNOWY RESOURCES | | BLUMER | ROBERT R |
| BIGLER | BONNIE | BLURTON | DENNIS E |
| BILL RAINS STUDIO INC | | BLYTHE | RICHARD D |
| BILLINGS BENCH WATER ASSOC | | BOAK | HAROLD E |
| BILLINGS LIVESTOCK COMMISSION | | BOCHY | GREG A |
| BILLINGS SIGN SERVICES INC | | BOELTER | TIM S |
| BILLINGS SOFTBALL ASSOCIATION | | BOERSCHINGER | MATHEW |
| BILLMAN | FRANK A | BOGAR | KENNETH C |
| BILLMAN | ANTON | BOGGESS | SAMUEL D |
| BILLSTEIN | RONALD E | BOGGIO | PHILLIP H |
| BILYEU | DALE E | BOHNEN | LARRY V |
| BINANDO | JAMES | BOHNEN | LARRY V |
| BINSTOCK | LARRY | BOILEAU | MIKE P |
| BISHOP | ROBERT W | BOISSEAU | RICHARD R |
| BISHOP | ELIZABETH M | BOIT | ROBERT W |
| BISON BETTER BUILT | | BOKUM | VICKI R |
| BISSONNET | MICHELE | BOLERJACK | FRANK L |
| BIZEK | DAVID | BOLEY | NAOMI |
| BJERKE | DUANE | BOLTON | KENNETH G |
| BJORDAHL | JEROME A | BOMAR | LEWIE |
| BLACK | GREG L | BOND | RALPH |
| BLACK | RICHARD L | BONGIANI | PAUL |
| BLACK | DAVID D | BONNEAU | FRED |
| BLACK | ALAN H | BONNEAU | WALLACE J |
| BLACK | JAMES E | BONSELL | JAMES E |
| BLACKBIRD | ELMER T | BOODRY | JANE |
| BLACKLEY | BRYCE | BOOTH | GARY |
| BLACKMORE | TONY | BOOTH | JON W |
| BLAIR | DONALD D | BORDEN | JOHN C |
| BLANK | FLOYD L | BORMANN | JON F |
| BLANK | STEVEN L | BOROWICK | LOUIS |
| BLANKENBAKER | CHARLES | BORTIS | BURDETTE O |
| BLANKENSHIP | THOMAS J | BOTCH | PHILIP |
| BLANKENSHIP | RICHARD D | BOTHWELL | TERRY M |
| BLANKENSHIP | BRYCE K | BOTTS | WALTER R |
| BLANKENSHIP | MARK J | BOUCHARD | RICK L |
| BLASKOVICH | STEVE A | BOURASSA | JON E |
| BLAZO | TRACY L | BOUWKAMP | MARVIN |
| BLEDSE | JEREMY M | BOWE | ROBERT L |
| BLEE | RALPH | BOWEN | THOMAS W |
| BLEHM | JAMES A | BOWERS | JILL |
| BLINCO | VERNON | BOWMAN | JOHN |
| BLOME | ED H | BOYCE | PATRICIA R |
| BLOOM | WILLIAM | BOYD | JAMES D |

| Last Name | First Name | Last Name | First Name |
|--------------------|------------|---------------------------|---------------|
| BOYD | ROBERT K | BROWN | SETH M |
| BOYER | JEAN G | BROWN | RICHARD E |
| BOYER | JAMES H | BROWN | BRIAN D |
| BOYER | GLENN R | BROWN | TROY D |
| BOYER | VERN S | BROWN | LARRY A |
| BRACE | DEBORAH A | BROWN | KEITH E |
| BRACKEN | DOROTHY J | BROWN | STEVE |
| BRADLEY | BOBBIE JO | BROWN | WILLIAM B |
| BRADSHAW | GARY | BROWNEE | WILLIAM |
| BRADSHAW | KATHLEEN | BRUBAKER | RON M |
| BRAMMER | JESSE O | BRUCE | KEVIN |
| BRANSTETTER | LAWRENCE | BRUMFIELD | RAYMOND G |
| BRANSTETTER | LEE E | BRUMIT | CHARLES J |
| BRANSTETTER | LOU ANN | BRUMLEY | LEE R |
| BRASS | CURT A | BRUNSVOLD | JAMES & JANET |
| BRASWELL | LOUIS | BRUSKI | VICTOR C |
| BRATCHER | ARLEEN | BUCKLEY | MICHAEL J |
| BRAY | TRACY G | BUCKLEY | DENNIS F |
| BRAZER | GEORGE | BUDGE | GERALD L |
| BRENNAN | LAURENCE A | BUECHLER | STEVE |
| BRENNAN | JOHN J | BUECHLER | GARY L |
| BRENSDAL | LARRY | BUEHRING | JASON L |
| BRESTER | DENNY | BUENING | ALVIN F |
| BRESTER | GREG | BUENING | ALVIN L |
| BRESTER | KELLY | BUERKLE | SUSAN I |
| BREW | W F | BUERKLEY | CAROL |
| BREWER | TED K | BUFFINGTON | RAY |
| BREWER | DONALD J | BUIKEMA | ROBERT M |
| BREWINGTON | BRAD J | BULL ENTERPRISES | |
| BREY | ARNIE | BULLINGER | GERALD F |
| BRIDGER | BERT C | BULLIS | C LOWELL |
| BRIEN | CARLA | BULLOCK | DOUGLAS A |
| BRITTON | KENNETH L | BUNDY | BROCK D |
| BRITTON | STELLA P | BUNNELL | TED A |
| BROADBENT | DUANE A | BURBANK | GARY W |
| BROCK | KRAIG A | BURCH | HARLEY |
| BRODERSON | JUANITA | BURCHETT | DELMAR |
| BRODIE | MICHAEL H | BURCHETT TAX SERVICE | |
| BROKEN ARROW RANCH | | BUREAU OF LAND MANAGEMENT | |
| BROOK | SANDY S | BURELL | DAN |
| BROOKS | CHARLES A | BURGER | DANNY L |
| BROOKSHIER | RICK | BURKHARDT | SHAWN M |
| BROSZ | ROD | BURKLEY | STANLEY |
| BROVEAK | DALE M | BURNARM | RONALD E |
| BROWN | DONALD M | BURNER | GLENN I |
| BROWN | R SCOTT | BURNETT | DARLENE L |
| BROWN | LARRY | BURNS | ROBERT D |
| BROWN | GORDON E | BURNS | JERRY A |
| BROWN | DAREN O | BURRIS | WAYNE |
| BROWN | RUSSELL G | BURT | LOUIS |

| Last Name | First Name | Last Name | First Name |
|---------------------------|------------|-----------------------------------|------------|
| BURTON | BEE | CARTER | LON D |
| BURTON | BEE | CARTER | GARY E |
| BUSCH | CRAIG | CARY | LAWRENCE E |
| BUSCHETTE | STEVE | CASE | PATRICIA J |
| BUSENBARK | SAMMY A | CASE | WILLIAM M |
| BUSH | GALE | CASEY | MICHAEL J |
| BUSH | MARK | CASEY | ROBERT J |
| BUTLER | EDWARD D | CASPER | DALLAS D |
| BUTLER | BRUCE C | CASSIDY | JAMES W |
| BUTLER | SHERI | CASSIDY | WILLIAM L |
| BUTLER | JAMES W | CASTEL | BRIAN I |
| BUTTERFIELD | DALE | CASTER | RICHARD |
| BUYS | DUANE | CASTER | JACK |
| BYE | DAVID | CASTER | JAY G |
| BYRNE | TIM | CASTLEBERRY | ROBERT A |
| C & B HAY GRINDING INC | | CASTO | JAMES S |
| C & H BUILDERS INC | | CATLIN | DAN A |
| CABBINESS | LENA | CATTLE DEVELOPMENT CTR LLC | |
| CAIN | JAMES M | CAVE | W DEAN |
| CAIN | WAYNE L | CAYTON | ZACHRY S |
| CAIN | RODNEY | CEBULL | BRIAN |
| CALDEIRA | DAVID A | CELLAN | DAVID |
| CALDERWOOD | PAT A | CELLMER | LAWRENCE W |
| CALDWELL | KELLY M | CELLMER | STEVEN L |
| CAMERON | JESSIE L | CENTRAL ACRES CHRISTIAN SCHOOL | |
| CANTIN | T J | CERKONEY | MARVIN |
| CANTU | SERAPHINE | CHAMPION | MARTHA |
| CANYON CREEK SCHOOL #4 | | CHAMPNEY | KIM B |
| CAPP | RAY M | CHANCE | NATHAN D |
| CAPRA | MICHAEL | CHANDLER | JACK E |
| CARD | BRUCE E | CHANDLER | CECIL R |
| CARD | DICK R | CHAPEL | JAMES |
| CARDWELL | FRANK | CHAPEL OF HOPE | |
| CARDWELL | ELMER W | CHAPIN | LEONA J |
| CARKEEK | TOM | CHAPMAN | RICHARD E |
| CARL | RAYMOND K | CHARBONNEAU | R W |
| CARLSON | RON | CHARLES | DAVID L |
| CARLSON | SCOTT A | CHARLTON | VINCE D |
| CARLSON | DAVID | CHARLTON | JAMES |
| CARLSTROM | MARK | CHATRIAND | ROBERT L |
| CARNS | ROBERT | CHELGREN | GARY |
| CARPENTER | GEORGE R | CHENOWETH | DARRELL E |
| CARPENTER | RONALD R | CHERRY | MERLE |
| CARR | ROBERT H | CHESTER | TRUDY |
| CARROLL | TOM W | CHIRRICK | GREG L |
| CARROLL | JAMES A | CHORIKI | RAYMOND |
| CARSON | KATHLEEN A | CHRISTENSEN | RICHARD C |
| CARSTENSEN | MARTHA L | CHRISTENSEN | KEAN D |

| Last Name | First Name | Last Name | First Name |
|------------------------------|-------------|-------------------------------------|------------|
| CHRISTENSON | DALE | COLTER | DONALD |
| CHRISTIAENS | MARIA J | COMBS | T SCOTT |
| CHRISTIANSON | MISTY J | COMBS | THOMAS G |
| CHRISTIANSON | TERESE A | COMMUNICATION ENHANCEMENT LLC | |
| CHRISTMANN | ALLEN H | COMPLETE INSULATION | |
| CHRISTOPHERSEN | VICKI G | COMPTON | CONLEY E |
| CHURCH OF GOD OF PROPHECY | | CONCRETE CONSTRUCTION COMPANY | |
| CICIERSKI | JEFFREY L | CONITZ | JESS W |
| CIMRHAKL | ELIZABETH A | CONNAGHAN | ROBERT L |
| CLARIN | DONITA R | CONRAD | HARVEY J |
| CLARK | ROY L | CONROY | THOMAS |
| CLARK | ERNIE L | CONSANI | LEONARD |
| CLARK | BOBBIE | CONTRERAZ | HENRY |
| CLARK | JAMES R M | COOK | GALEN L |
| CLARK | DOUGLAS M | COOK | CHARLES A |
| CLARK | DANIEL E | COOK | CORNELIUS |
| CLARK | DEAN L | COOK | DARRELL J |
| CLARK | RUSS C | COOLEY | ROBERTA K |
| CLASSIC DESIGN HOMES | | COOMBS | BOB W |
| CLAUSSEN | VICKIE G | COOMBS | JOHN W |
| CLAY | FRANK | COONEY | STEPHEN L |
| CLEARY | WILLIAM D | COONS | DAVID |
| CLEVELAND | GARY A | COOPER | RICHARD H |
| CLEVENGER | LOREN L | COOPER | TOM A |
| CLEVENGER | JAMES K | COOPER | PATRICIA L |
| CLICK | C J | CORBIN | LINDA |
| CLIFFORD | LARRY J | CORCORAN | JAMES |
| CLIFTON | ELLEN B | CORNEAU | WILFRED |
| CLINGENPEEL | JOSEPH L | COLES | DAVID L |
| CLOSE | BRETT C | COLLIER | KEN L |
| CLOUSE | LARRY R | COLLINS | KELLY P |
| CLYDE'S PLACE | | COLTER | DONALD |
| CMG CONSTRUCTION INC | | COMBS | T SCOTT |
| CMW CONSTRUCTION | | COMBS | THOMAS G |
| COCHRAN | JAY M | COMMUNICATION ENHANCEMENT LLC | |
| COE | JIM R | COMPLETE INSULATION | |
| COLARCHIK | PATRICK L | COMPTON | CONLEY E |
| COLDEN | WAYNE | CONCRETE CONSTRUCTION CO. | |
| COLE | SCOTT E | CONITZ | JESS W |
| COLE | MARTIN D | CONNAGHAN | ROBERT L |
| COLEMAN | TIFFANI | CONRAD | HARVEY J |
| COLEMAN | RALPH L | CONROY | THOMAS |
| COLEMAN | MARION V | CONSANI | LEONARD |
| COLES | DAVID L | CONTRERAZ | HENRY |
| COLLIER | KEN L | COOK | GALEN L |
| COLLINS | KELLY P | COOK | CHARLES A |

| Last Name | First Name | Last Name | First Name |
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| COOK | CORNELIUS | CREEK | LLOYD D |
| COOK | DARRELL J | CRELLIN | RANDALL |
| COOLEY | ROBERTA K | CREWS | MICKEY |
| COOMBS | BOB W | CRICHTON | ROBERT E |
| COOMBS | JOHN W | CRICK | GARY R |
| COONEY | STEPHEN L | CRILLY | DON |
| COONS | DAVID | CRILLY | IRENE IONA |
| COOPER | RICHARD H | CRITELLI | TIM A |
| COOPER | TOM A | CRITELLI | ROCCO J |
| COOPER | PATRICIA L | CRITELLI COURIERS | |
| CORBIN | LINDA | CROFT | HARRY |
| CORCORAN | JAMES | CROMWELL | DEAN C |
| CORNEAU | WILFRED | CROSMER | DAVE F |
| CORNERSTONE COMMUNITY CHURCH | | CROSS | KERI A |
| CORPORATE FUND MANAGEMENT | | CROSS | GREGORY |
| CORTEZ | TINA M | CROSSROADS BAPTIST CH | |
| COSCIA | DON A | CROUSE | LARRY D |
| COSSITT | JERRY W | CROUSE | LAWRENCE |
| COSTER | DONELLE L | CROUSE | CHARLES A |
| COULTER | CLARKE | CROUSE | JAMES R |
| COUNTRY SUBDIVISION WATER | | CROWLEY | JIM |
| COUNTY WATER DISTRICT | | CROWN PARTS & MACHINE | |
| COURTNAGE | LYLE A | CRUZAN | MICHAEL G |
| COURTNEY | M DALE | CUELLAR | JERI L |
| COVALL | STEPHEN T | CULLINAN | FRANK F |
| COVINGTON | RICHARD W | CUMMINGS | KRISTOPHER M |
| COWAN | NEAL D | CUMMINS | RUDOLPH J |
| COWDIN ESTATES | | CUNNINGHAM | THOMAS P |
| COWEE | PATSY | CUNNINGHAM | LARRY D |
| COX | NANCY L | CUNNINGHAM | JAMES F |
| COX | DAVID L | CURFMAN | DAVE L |
| COX | JEAN C | CUSKER | NOELA R |
| COX | GARELD | CUSTER | BRUCE |
| COX | JIM | CUSTER CEMETERY | |
| CRABLE | GARY P | CUSTER COMM CHURCH | |
| CRACKENBERGER | CURT | CUSTER FIRE DEPARTMENT | |
| CRADDOCK | MIKE G | CUSTER POST OFFICE | |
| CRAGO | BILL | CUTLER | JOHN C |
| CRAIG | BRADLEY D | CWALINSKI | WALTER A |
| CRAIN | MICHAEL R | CYBULSKI | TIM |
| CRAMER | DON R | CYPHERS | SHIRLEY B |
| CRANFORD | LEONARD A | CZARNY | TERRY |
| CRAWFORD | TOM | D BAR Y RANCH | |
| CRAWFORD | JAMES L | DAEM | RONALD A |
| CRAY | LESLIE | DAHL | TED A |
| CRAY | LESLIE G | DAHL | LINDA L |
| CREECY | J L | DAHL | MATTHEW K |
| CREEK | KERMIT | DAHL | JOHN F |

| Last Name | First Name | Last Name | First Name |
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| DALKE | DAVE | DEGENHART | ALBERT J |
| DALLMAN | DALE E | DEGENHART | EVELYN |
| DAMJANOVICH | CORBIN | DEICHL | LEO A |
| DANDREA | WAYNE S | DEINES | IRENE L |
| DANGERFIELD | REGINALD | DEINES | JUDY D |
| DANIELS | JANICE | DEINES | DALE |
| DANTIC | MIKE J | DEINES | WILLIAM L |
| DARFLER | PATTI | DEINES | WILLIAM |
| DARKENWALD | S A | DEITSCH | GEORGE P |
| DARNIELLE | DAVID E | DEITZ | JON D |
| DARRAH CORPORATION | | DELAWARE | ROCKY L |
| DAUM RANCH | | DELCAMP | DAVID |
| DAUPHINAIS | MARCI L | DELCAMP | MACK |
| DAVENPORT | JAMES H | DELP FAMILY TRUST | |
| DAVIDSON | JOSH J | DEMARAY | RICHARD D |
| DAVIS | DONALD L | DEMARAY | GORDON J |
| DAVIS | GARY M | DEMAREE | NORRIS J |
| DAVIS | COREY | DENNEHY | PAUL J |
| DAVIS | STUART L | DENNEY | CRAIG R |
| DAVIS | ROBERT E | DENNING | KENNETH |
| DAVIS | PETE J | DENNIS | DANA A |
| DAVIS | JAMES R | DENNY | LESLIE L |
| DAVIS | ARLETHA E | DERBY | JIM E |
| DAVIS | GARY C | DERHEIM | MARVIN |
| DAVIS | CAROL M | DERTING | STEVE L |
| DAVIS | RAYMOND P | DESJARLAIS | SHARON L |
| DAVIS | MICHELLE L | DETENNE & SON | |
| DAVISON | JANET | DETILING | LEO |
| DAYLIS | GEORGE A | DETRICK | DALE W |
| DCOLBURN | STEPHEN G | DETTWILER | GARY G |
| DE BAR | CANDACE | DEVENER | MARY JO |
| DE CRANE | THOMAS A | DEVITT | JANICE A |
| DE FRANCE | FRED J | DEVITT | CYNTHIA H |
| DE GRAND | DANIEL D | DEVIVIER | DICK |
| DE KLYEN | PEGGY J | DEVRIES | DARIN N |
| DE LEEUW | MONTEE L | DEWALD | ROBERT L |
| DE VERNIERO | JAMES C | DEWING | DEAN |
| DE VRIES | RICHARD | DEYLE | DANNI P |
| DE VRIES | RICHARD | DEYOUNG | E R |
| DE VRIES | RICHARD D | DIAL | KEITH W |
| DE VRIES | BRUCE | DIAMOND B LIVESTOCK | |
| DE VRIES | DAVID C | DIAMOND X FARMS INC | |
| DEAN | RICHARD W | DIAZ | JENNY |
| DEASON | C W | DICK | SHIRLEY M |
| DECKER | STANLEY F | DICUS | PAT |
| DECKER | DICK | DIENHART | WAYNE L |
| DEGELE | DALE J | DIERCKS | LEONARD A |
| DEGELE | ROBERT G | DIERENFIELD | RACHEL |
| DEGENHART | ROY A | DILLEY | RICHARD H |
| DEGENHART | RICHARD D | DILLON | CHARLES H |
| DECKER | STANLEY F | DIXON | PAUL |

| Last Name | First Name | Last Name | First Name |
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| DIXON | LYNN H | DUNN | ROBERT B |
| DOANE | SHARON M | DUNNING | MARK |
| DOBITZ | CHRIS L | DUNNING | FRANCIS E |
| DOELY | STEPHEN H | DUPUIS | SUZANNE |
| DOERR | NANCY K | DURAND | DARLENE M |
| DOLAN | MIKE M | DUSTIN | JUDITH |
| DOLECHECK | FRANK J | DUSTIN | JAMES |
| DOLPH | DOUG K | DVORAK | NORMAN L |
| DOMPIER | ROBERT L | DVORAK | DOUG |
| DONAHUE | TIM W | DVORAK | DONALD J |
| DONAHUE | MICHAEL F | DVORAK | RANDI D |
| DONOVAN | VICTOR J | DVORAK | DORAN |
| DOOLEY | MICHAEL P | DYK C CONSTRUCTION CO | |
| DORHAUER | ALAN | EAGLE ROCK GOLF COURSE | |
| DORRIS | APRIL L | EAMES | POLLY H |
| DOTSON | DALE A | EASLEY | LORAYN M |
| DOUBLE L RANCH | | EASTLICK | G D |
| DOUCETTE | MARK S | EASTON | DON |
| DOVE | WILLIAM C | EASTWOOD ESTATES | |
| DOWDY | DICK | EATON | BREE D |
| DOWNER | MARJORIE J | EATON | DEXTER A |
| DOWNING | LEE | ECHERD | ROBERT S |
| DOWNS | WILLIAM A | ECKHARDT | EUGENE E |
| DOWNS | RALPH M | EDAM | DALE |
| DOWNS | DAN | EDDY | THOMAS E |
| DOWNS | ERNEST | EDGAR | GENE E |
| DOWNS | JUSTIN P | EDISON | GEORGE |
| DOYLE | ROBERT M | EDWARD | BARRY M |
| DOYLE | ERROL D | EDWARD RANCHES INC | |
| DRAGOO | NATALIE L | EDWARDS | LLOYD M |
| DREESZEN | DOUG | EDWARDS | JULIE A |
| DREW | MICHAEL J | EDWARDS | ROB R |
| DREWRY | WADE R | EENHUIS | SCOT D |
| DRINGMAN | ERIC R | EGAN | WAYNE H |
| DRINKWALTER | KAREN J | EGAN | SHAWN L |
| DRINKWALTER | DONNA | EGGART | JUSTIN T |
| DRINKWALTER HORSESHOEING | | EGGE | PETERA |
| DROSS | WHIT | EGOLF | GEORGE |
| DU CHARME | PAUL J | EHLENBURG | JOE P |
| DUBEAU | ED | EHLERS | PHILIP H |
| DUBELL | CHARLES | EHRICK | GUY |
| DUBS | LOUIS C | EICKHOFF | HELEN G |
| DUKART | TERRY L | EIDE | STEVE M |
| DUKE | ERIC R | EINARSON | RICHARD |
| DUNBAR | ERWIN D | EISENBRAUN | FRELIN G |
| DUNCAN | EARL A | EISENMAN | STANLEY |
| DUNCAN | JOYCE | EISENMAN | WAYNE V |
| DUNKIN | EVELYN L | EISENMAN | LANCE J |
| DUNKLEE | DENNIS | EKLE | TIGE G |
| DUNLAP | DANIEL J | EKLUND | THEODORE E |
| DUNN | TONY P | EKWORTZEL | RICK |

| Last Name | First Name | Last Name | First Name |
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| ELDRED | ROBERT | EVIG | ROSS |
| ELDRIDGE | SCOTT C | EWALT | KENT |
| ELENBURG | GARY L | EWEN | KEITH |
| ELESON | IRWIN J | EWEN | CYNTHIA |
| ELLEDGE | F BRUCE | EWEN | FORREST E |
| ELLIOT | CLARKE | EXPRESS PIPELINE LLC | |
| ELLIOT | DEAN H | EYRE | JERALD |
| ELLIOTT | GARY | F P INC | |
| ELLIS | ARLAN | FACER | WILLIAM E |
| ELLISON | LIONEL S | FACHING | ASHLEY L |
| ELVESTROM | JOHN O | FADRHONC | DENNIS |
| EMICK | PATRICK C | FAITH CHAPEL | |
| EMINETH | JAMES | FALLANG | TODD D |
| EMINETH | TED | FARK | WILBURN F |
| EMINKAY TRUSSES AND COMPONENTS | | FARNHAM | STANLEY |
| EMLIN INC | | FARRINGTON | DALE E |
| EMMONS | MARY J | FASCHING | LEE ROY |
| EMMONS | MARY ANN | FAUST | CHESTER |
| EMTER | COREY M | FAUTH | KURT J |
| ENGDAHL | DUANE R | FEDERICO | CARMEN M |
| ENGEN | DAVID D | FEHRINGER | NEAL |
| ENGLISH | H ELWOOD | FEIST | JOSEPH M |
| ENNIS | TIMOTHY | FELMLEE | GEORGE |
| ENNIST | FRED R | FELMLEE | DWIGHT S |
| ENSLEY | MARK P | FELS | HAROLD L |
| ENSTROM | GARY G | FERALIO | DOMINICK |
| EQUALL | DUANE | FERCH | WILLARD A |
| ERB | SHARON I | FERCHO | LEO |
| ERB | STEVEN M | FERGUSON | ABBY |
| ERB | RODNEY A | FERGUSON | LARRY W |
| ERBEN | WILLIAM F | FERGUSON | ROY E |
| ERHART | VIOLA D | FETTER | MATT E |
| ERHART | WAYNE | FETTIG | STEVE R |
| ERICKSON | EDWARD E | FETTIG | ROGER J |
| ERICKSON | ROCKY | FICK | RICHARD E |
| ERPELDING | JOSEPH | FIECHTNER | STEVE R |
| ERREBO | MARK T | FIELD | DAVID J |
| ERSKINE | THOMAS | FIGGINS | GEORGE |
| ERVIN | MICHAEL E | FIGGINS | RICHARD E |
| ESCHLER | ERIC B | FIKE | WADE T |
| ESHLEMAN | JOHN | FIMRITE | BRADLEY M |
| ESPELAND | RICHARD | FINCH | BRANDON J |
| ESPY | JIM | FINK | GLENN R |
| ESSER | ROBERT J | FINN | RALPH |
| ESSEX | LYNN S | FINSTAD | ERIC |
| EVANGELINE | MARK | FISCHER | TOM A |
| EVANGELINE | JAMES P | FISCHER | DOUG J |
| EVANS | PHILIP M | FISCHER | ERVIN B |
| EVENSON | JERRY D | FISHER | DAVID R |
| EVERAERT | R ED | FISHER | GEORGE A |
| EVERGREEN ESTATES HOME OWNERS | | FISHER | JAMES L. |

| Last Name | First Name | Last Name | First Name |
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| FISHER | ED P | FOSTER | JOSEPH W |
| FISHER | CRAIG M | FOSTER | JOE W |
| FISHER | ED L | FOURNIER | JOSEPH C |
| FISHER | ROBERT | FOUST | RICHARD L |
| FISHER | SHARON | FOUTS | JOE D |
| FISHER | RICHARD | FOWLER | CHARLES |
| FISHER | DON | FOWLER | LANCE |
| FISHER | JOHN W | FOWLER | SHANE R |
| FISHER | MICHAEL C | FOX | DARRELL |
| FISHER | BRUCE W | FOX | MARK |
| FISHER SAND & GRAVEL | | FOX | TERRY |
| FITCH | JEFFREY T | FOX | ROBERT |
| FITCH | ROBERT G | FOX | DARLENE |
| FITCH | CURTIS R | FOX | ROY R |
| FITZGERALD | JAMES C | FOX | LARRY W |
| FIVE C'S PARK & POOL | | FOX | PHILLIP |
| FIX | RYAN T | FOX | JOHN WILLIAM |
| FIX | LORRAINE M | FOX | J R |
| FLAHERTY | DENNIS | FOX | DAVID L |
| FLANZE | W CARL | FOX | JOYCE |
| FLAT LIP | ARCHIE K | FOX | BONNIE L |
| FLATTUM | CAROL E | FOX | JAMES H |
| FLEGAL | JAMES M | FOX | JESSE L |
| FLEMING | JEFFREY B | FOX | HARVEY E |
| FLETCHER | DICK L | FOX | RICHARD A |
| FLIPSE | STEVE D | FOX | KEVIN |
| FLOCK | KEVIN R | FOX | JERRY D |
| FLOHR | GARY D | FRADET | JERRY |
| FLOYD | STAN V | FRALEY | JULIE |
| FLY CREEK ANGUS INC | | FRANCIS | CARL |
| FOGLE | LYLE | FRANCK | STEVE J |
| FOGLE | D ROGER | FRANCZYK | GREG P |
| FOLEY | A L | FRANK | CLAYTON |
| FOLKERTS | ARTHUR | FRANK | WARREN |
| FOLLMER | GLENN A | FRANK | LEE ROY |
| FOOS | DONALD A | FRANK | SAM |
| FOOS | CLARENCE | FRANK | RIENHOLD |
| FOOS | SHEILA Y | FRANK | GARY G |
| FOOTTIT | RICHARD | FRANK | HAROLD G |
| FORD | RONALD G | FRANK | LESLIE S |
| FOREMAN | KENNETH | FRANK | DOUGLAS D |
| FOREMAN | CURTIS | FRANK | JAKE |
| FORNSHELL | MIKE L | FRANK | RONALD E |
| FORTIER | JOHN F | FRANK | RONALD D |
| FORTUNE | JAMES | FRANK | ROD D |
| FORTY-EIGHTH STREET WEST | | FRANK | LAURA BRESTER |
| FORWOOD | PATRICIA | FRANK | LARRY |
| FOSJORD | JOHN E | FRANK | LESLIE D |
| FOSS | JASON J | FRARE | DENNIS H |
| FOSS | GARY | FRASER | DANNY |

| Last Name | First Name | Last Name | First Name |
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| FRASURE | RANDALL | GASCHK | VICKI K |
| FRAZIER | GARY G | GASPER | JOE L |
| FREDERICK | R LE ROY | GATCH | DAN N |
| FREDERICK | A L | GATLIN | COURT D |
| FREDERICKS | D J | GEBHARDT | VERN L |
| FREEMAN | MARJORIE M | GECK | DARRIN A |
| FREIER | WAYNE E | GEE | LESTER C |
| FREITAG | MARY | GEERING | ANNIE |
| FREIVALDS | PETER | GEERTZ | WOODY M |
| FRENCH | GLENN | GEHRING | GARY |
| FRENCH | STEVE H | GEHRING | ALBERT |
| FRENCH | STEVEN L | GENEX / HAWKEYE WEST | |
| FREY | DIXIE L | GEORGE | NORMAN M |
| FREY | MARILYN F | GERBER | BEN H |
| FRICKEL | RANDY J | GERBER | DONNA R |
| FRICKEL | DAVID R | GERSHMEL | GRANT L |
| FRICKEL | GERALD | GIBSON | KAREN M |
| FRICKEL | LINDA K | GIESER | BERNIE |
| FRICKS | DWAYNE | GIESICK | WILMA |
| FRIED | KERWIN W | GIESICK | DAVID W |
| FRIELING | PHILLIP J | GIESICK | ROBERT G |
| FRIESEN | DENNIS R | GILBERT | VELNA E |
| FRIESEN | ROBERT E | GILBERT | TERRI |
| FRIEZ | LARRY | GILBERT | HAROLD L |
| FRISON | TERRY | GILBERTSON | ESTHER E |
| FRITEL | GARRY J | GILBRAITH | BRIAN E |
| FRITZ | SHADD | GILES | ANATOLE S |
| FRITZ | ERNIE L | GILLES | J E |
| FRITZ | ROBERT L | GILLIS | MARTIN W |
| FROELICH | SCOTT A | GILLITZER | ROMAN A |
| FROMDAHL | ROBERT R | GILLNER | CLIFFORD A |
| FROST | BOB L | GILREATH | KENNETH |
| FRYETT | DARCY R | GILREATH | TOM |
| GABEL | ROY | GILREATH FARM | |
| GABEL | BETTY | GIONO | MARK T |
| GABEL | RANDY | GIOVETTI | PETE C |
| GABEL | MICHAEL T | GIRARDIN | CARL W |
| GABLE | DALE J | GIRARDOT | LARRY L |
| GADBERRY | DANIEL | GIVEN | GANEL G |
| GAIRRETT | KENNETH P | GLASGOW | GARY E |
| GALLAGHER | BARBARA M | GLASGOW | RAY |
| GALLAND | MIKE | GLASSER | TERESA J |
| GALLE | HUGO | GLATT | ARNIE A |
| GAMBLE | CHARLES E | GLEASON | ARLAND Y |
| GANGSTAD | PERRY | GLEN | PATTY V |
| GAPPA | STANLEY W | GLENN | EVERETT E |
| GARCIA | DARELL J | GLIKO | JERRY J |
| GARDNER | ROBERT C | GNEITING | TERENCE A |
| GARDNER | STEVEN | GODDARD | CHARLES |
| GARDNER | GREY C | GODFREY | SCOTT L |
| GARRISON | PAT | GODIJOHN | CINDY L |

| Last Name | First Name | Last Name | First Name |
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| GODWIN | TED P | GREEN | WILLIAM S |
| GOFF | MICHAEL M | GREEN | BRAD |
| GOGGINS | JACK | GREENE | HENRY |
| GOGGINS | JOE L | GREENFIELD | JEFF |
| GOGGINS | PATRICK K | GREENO | ALVIN L |
| GOHL | PENNIE D | GREENWALT | KEVIN |
| GOHR | CLAY R | GREENWOOD | THOMAS R |
| GOINS | DICK | GREENWOOD | ROBERT |
| GOLDBERG | KURT M | GREGORY | TIMOTHY E |
| GOLDEN EAGLE WATER USERS ASSOC | | GREWELL | EUNICE E |
| GOLL | CLARENCE | GREWELL | JAMES |
| GOLLER-WILLIS | JACKIE L | GREWELL | RICHARD H |
| GOMEZ | AMBROSE | GREWELL | RICHARD E |
| GONE | MARILYN J | GREWELL | JOHN L |
| GONION | ROBERT L | GREYN | DANIEL S |
| GONYEA | JOHN N | GRIBBEN | TERRY S |
| GONZALES | KATHERINE D | GRICE | GEORGE E |
| GONZALES | RON R | GRICE | HERBERT P |
| GONZALES | VINCENT | GRIESER | EMILIE C |
| GONZALEZ | JESSE Y | GRIFFITH | MARK A |
| GOODALE | GARY | GRIMSRUD | RON A |
| GOODMAN | JERRY | GRISMER | JOHN W |
| GOODMAN | STEVEN H | GROSCOP | DENNIS D |
| GORALCZYK | KAREN M | GROSS | MYRON S |
| GORDON | TERRY | GROSSKOPF | RICHARD L |
| GORDON | JAMES R | GROTBO | JOHN A |
| GORDON | BEVERLY | GROUT | ANDREW J |
| GOSSACK OLSON | NANCY K | GROVE | BETTY J |
| GOTTULA | JOHN E | GROVIJAHN | JEFF L |
| GRADWOHL | ROBERT H | GRUNENFELDER | MICHAEL |
| GRAF | LOREN T | GRUNST | MARK |
| GRAF | PAUL | GRUSING | HAROLD |
| GRAHAM | DAVID B | GUDGELL | DONALD W |
| GRAMMENS | ED | GUENTHNER | TIM A |
| GRAMMENS | TIM | GUENTHNER | THEODORE B |
| GRAMMENS | ROBERT | GUILFOYLE | ROBERT J |
| GRANADA | GENNA B | GULBRANDSON | STEPHEN D |
| GRANDPRE | TIMOTHY | GULLARD | BARBARA J |
| GRANT | DARRIN T | GULLETT | DENNIS W |
| GRANTHAM | EZRA | GUM | BEN F |
| GRANTZ | LARRY E | GUM | BARRY |
| GRAUBERGER | JOHN K | GUNDERSON | JOHN R |
| GRAVES | ALAN C | GUNDERSON | GERALD A P |
| GRAVES | DAVID E | GUNDLACH | LEWIS A |
| GRAY | VIKKI L | GUNLOCK | SAM W |
| GRAY | ROB | GUNLOCK | SAM W |
| GRAY | DAN D | GUNN | MARY L |
| GRAYSON | LYLE | GUNN | RONALD W |
| GRAYSON | REID E | GUNN | MARSHA L |
| GREEN | JOHN W | GUNNELS | RALPH |
| GREEN | DAVID D | GUNSCH | ROY |

| Last Name | First Name | Last Name | First Name |
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| GUNTER | KARI G | HAMMER | KEITH |
| GUNTHER | GLENN A | HAMMERSMARK | MARVIN M |
| GUSTAFSON | BETTE M | HAMMOND | L CLEVE |
| GUSTIN | KENNETH J | HAMMONS | DANNY B |
| GUTIERREZ | RODOLFO N | HAMMONTREE | LUETTA M |
| H O T EXPRESS | | HAMPLE | SHIRLEY |
| HAAGENSON | ANDREA C | HAMPLE | KELLY |
| HAAS | ESTHER M | HANCE | KEVIN W |
| HAASE | RITA A | HAND | RANDY |
| HACKMAN | STEVE C | HANDEL | NORMA R |
| HACKMAN | SHAWN A | HANDO | SHAWN P |
| HADLEY | DANIEL R | HANKEL | LARRY |
| HADLEY | YVONNE M | HANKEL | FRED L |
| HAFF | RICH | HANKS | GARY |
| HAFNER | GREGG A | HANNA | WILLIAM M |
| HAGAN | PAT | HANNAH | KAREN S |
| HAGAN | MARY ANN | HANNAH | STEVE |
| HAGEL | KEN | HANSEN | CARL |
| HAGEL | FRANK L | HANSEN | ALAN E |
| HAGEL | DOUGLAS M | HANSEN | JAY R |
| HAGEMO | MONTE A | HANSEN | TODD C |
| HAIGH | JOHN R | HANSEN | E KATHLEEN |
| HAILSTONE | JOHN | HANSON | LINDA L |
| HAKE | OWEN F | HANSON | JEWEL C B |
| HALA | RICHARD V | HANSON | COLLIN J |
| HALE | MARK A | HANSON | ED C |
| HALE | ROBERT S | HANSON | DIANA L |
| HALE | VERLIN C | HANSON | E R |
| HALL | JAMES W | HANSON | WINI L |
| HALL | KENNETH E | HANSON | MICHAEL H |
| HALL | MICHAEL W | HANSON | DALE E |
| HALL | RICHARD N | HANSON | LEO R |
| HALL | GEORGE A | HANSON | BRIAN E |
| HALL | RUSSELL V | HANSON | DEG |
| HALL | GEORGE A | HANSON | PAUL D |
| HALL | MARILYN L | HANSON | ARDIS L |
| HALL | PATRICIA A | HANSON | CASEY M |
| HALL | CHARLOTTE R | HARAKAL | STEVEN J |
| HALL OUTDOOR ADVERTISING | | HARFBAUGH | EILEEN T |
| HALLAND | DALE L | HARCHARIK | RON W |
| HALLING | RICHARD D | HARDEN | DEBBIE D |
| HALVERSON | JACK J | HARDEN | DONALD L |
| HALVERSON | JIM R | HARDT | BROS |
| HAMAN | ROGER | HARDT | RAY |
| HAMAN | CARY J | HARDT | DICK |
| HAMAN | JIM E | HARDT | BRAD |
| HAMBURG | RUSSELL C | HARI | CHERYL V |
| HAMILTON | JUSTIN R | HARI | ROBERT F |
| HAMILTON | COLIE R | HARMON | JAMES T |
| HAMM | BRUCE | HARMON | WANDA J |
| HAMMATT | GENE | HARMS | GAIL S |

| Last Name | First Name | Last Name | First Name |
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| HARPER | MILO F | HAYS | WENDELL R |
| HARPER | JAY L | HAZEN | HARVEY R |
| HARRELL | DAREN T | HEALEY | JERRY J |
| HARRINGTON | VICKY J | HEATH | RICK |
| HARRIS | PHIL | HEATON | BOBBY |
| HARRIS | JON D | HEBENER | CLARICE |
| HARRIS | LAURA M | HECKER | GARY |
| HARRIS | JOHN H | HECKER | ROGER N |
| HARRIS | RICHARD J | HECKER | JOEL B |
| HARRIS | MEL | HECTOR | ROBERT M |
| HARRIS | KATHLEEN R | HEDGES | DONALD E |
| HARRIS | JACK | HEDGES | GARY R |
| HARRIS | EVA M | HEDGES | BERNARD F |
| HARRIS | DAVID D | HEDIN | MERLYN J |
| HARRIS | ROB W | HEDRICK | JOSH |
| HARRUFF | GLENN I | HEDRICK | BERNIE |
| HARSTAD | ROBYN | HEEG | JASON D |
| HART | THOMAS E | HEGER | JIRI |
| HART | BETTY | HEGG | ROBERT M |
| HART | ANTHONY W | HEIDEMA | JACK O |
| HART | WILMER D | HEIDEMA FARMS INC | |
| | | HEIGHTS ASSEMBLY OF GOD | |
| HARTLE | SHANNA R | | |
| HARTMAN | MELISSA E | HEIMBICHNER | MARK |
| HARTMAN | KEITH T | HEIMBICHNER | MARIAN E |
| HARVEY | KENNETH D | HEIMBUCK | BARBARA L |
| HARWOOD | BEN P | HEIN | MARIE |
| HARWOOD | MONTY J | HEIN | KENNETH R |
| HASH | CRAIG E | HEIN | BETHANY M |
| HASH | RICHARD | HEIN | JAMES L |
| HASKINS | JAMES | HEIN | BILL |
| HASSETT | BARBARA L | HEIN | BRIAN A |
| HAUBER | EDWARD E | HEIN | RUTH M |
| HAUBER | ED | HEINZEROOTH | MARK A |
| HAUBER | GEORGETTE | HEISER | MARY |
| HAUGHEY | FLORA | HEISER | LAWRENCE D |
| HAUGSE | VERNON | HEITZ | JASON T |
| HAUPT | JEANNE A | HELFRICH | JOHN R |
| HAVERLAND | TED | HELGESON | ROBERT E |
| HAVIG | DONALD R | HELGESON | KEN D |
| HAWKE | ROBERT G | HELGESON | BERT A |
| HAWKINS | GARY | HELLAND | LAVANCH P |
| HAWKS | HOWARD | HELLMAN | JERRY B |
| HAWORTH | LAWRENCE | HELM | WILLIAM |
| HAWTHORNE | EDWARD R | HELTERBRAN | RICHARD P |
| HAYDEN | HAROLD G | HELVIK | KARL M |
| HAYES | ALAN C | HELZER | RANDY L |
| HAYES | ROBERT M | HEMBD | JOHN D |
| HAYNES | GEORGIA R | HEMPHILL | GINGER D |
| HAYNES | C SAM | HENCKEL | RON |
| HAYS | WENDELL H | HENDERSON | RONNIE |

| Last Name | First Name | Last Name | First Name |
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| HENDERSON | CARL W | HILL | ADAM |
| HENDERSON | EDWARD D | HILL | BRENDON S |
| HENDERSON | FORREST W | HILL | LYLE F |
| HENGEL | PETER P | HILL | JAMES H |
| HENKE | GERALD A P | HILL | MARJORIE R |
| HENKEL | KEVIN P | HILL | KEVIN |
| HENLEY | EARL E | HILL | DEBORAH L |
| HENMAN | JACE D | HILL | WALLACE |
| HENMAN | WALLACE L | HILL | ROBIN E |
| HENNEK | BERNARD | HILL | WESLEY W |
| HENNING | KARL | HILLEBOE | JAMES S |
| HENRICHS | LESLIE E | HILLESLAND | TOM |
| HENRY | SHASTA K | HILLIARD | ROBERT |
| HENRY | RON D | HINE | GLEN F |
| HENRY | THOMAS | HINGST | AMY L |
| HENRY | SHANNA D | HINKLE | VICTOR |
| HENSLEY | CHARLES E | HINKLE | ELIZABETH |
| HENSLEY | TERRI | HINMAN | RICK H |
| HENTZ | THOMAS C | HINRICHS | GARY R |
| HERBERG | JON | HINTHORNE | TOM |
| HEREIM | CHARLES E | HINTT | KELLY S |
| HERGETT | GERALD R | HINZ | JERRY |
| HERMAN | T J | HIRNING | DAVID J |
| HERMAN | RON A | HIRSCH | ELMER |
| HERMAN | DAN L | HIRSCHFELT | TERRY |
| HERMAN | DEE | HIRSCHI | CHANDRA N |
| HERMAN | MARGIE G | HIRSCHI | GORDON |
| HERNANDEZ | FRANK P | HIRSCHI | BRET W |
| HERREN | GARY R | HOAGLAND | R NEIL |
| HERT | TIM D | HOBAN | JAMES |
| HERT | FRANCIS | HOBAN | LARRY |
| HERT | GARY | HOBAN | BRIAN |
| HERTZ | JAMES | HOBAN | RODNEY P |
| HERZOG | JUDITH B | HOCHHOLDINGER | WOLFGANG |
| HESER | WILLIAM N | HODGES | GLADYS L |
| HEUPEL | WILMER | HODGES | RICHARD S |
| HEUPEL | MYRON | HODGSON | NORMA |
| HEYD | LORENZ | HODNIK | JAMES L |
| HEYING | CRAIG R | HOECKELBERG | HERBERT |
| HEYN | LOIS R | HOEFER | RICH A |
| HIBSCHER | JAMES | HOEFER | WILLIAM |
| HICKSON | WILLIAM J | HOEHNE | MARY G |
| HICKSON | WILLIAM V | HOENKE | MICHAEL D |
| HICKSON | BRENDA L | HOER | ROBERT J |
| HIGGINS | CARL | HOER | DAVID J |
| HIGLEY | JAMES J | HOER | DON L |
| HILDERBRAND | MARTELL J | HOER | CHRIS R |
| HILDRETH | BRIAN | HOERER | CHARLES |
| HILDRETH | BRET S | HOERER FAMILY RANCH INC | |
| HILL | NICK R | HOFFERBER | JOE A |
| HILL | ROBERT J | HOFFERBER | JAMES R |

| Last Name | First Name | Last Name | First Name |
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| HOFFERBER | DANIEL R | HOPKINS | ANGIE |
| HOFFMAN | GEORGE P | HOPKINS | DARRELL |
| HOFFMAN | PHIL M | HOPKINS | GERALD L |
| HOFFMAN | ERIC W | HOPPEL | BARBARA A |
| HOFFMAN | DAVE A | HOPPMAN | JOSEPH |
| HOFFMAN | FRED | HORN | DAVID A |
| HOFFMAN | DIANE | HORN | JAMES F |
| HOFFMAN | LEA ANNE | HORNER | WILBERT A |
| HOFFMAN | FRED P | HORNING | EDWARD C |
| HOFFMAN | DONALD F | HORNUNG | THOMAS |
| HOFFMAN | LA VOYCE A | HORTON | RICKEY |
| HOFFMAN | JACK | HORTON | ANNE |
| HOFFMAN | TRISTA M | HORTON | DOUGLAS G |
| HOFFMAN | KEVIN E | HORTON | GARY |
| HOFFMAN | GERALD D | HOSIER | MARK P |
| HOFMAN | JOE | HOTCHKISS | JAMES L |
| HOFMANN | EDWARD L | HOUGEN | ROGER B |
| HOGSTAD | JASON G | HOUGHTON | WALT |
| HOLBROOK | SUSAN A | HOUGHTON | WALT |
| HOLBROOK | DANNY | HOULIHAN | LARRY |
| HOLCOMB | DAVID T | HOUSER | JOSEPHINE A |
| HOLDERITH | JOHN K | HOUSKA | STEVEN |
| HOLETZ | MATT L | HOWARD | JEFF S |
| HOLLAND | TONY L | HOWARD | CARLA S |
| HOLLAND | FRED L | HOWARD | JOHN E |
| HOLLAND | ROBERT P | HOWE | LOUIS |
| HOLLAND | RICHARD | HOWE | GARY G |
| HOLLAND | IRENE | HOWELL | MICHAEL |
| HOLLENBECK | MIKE C | HOWELL | RANDY G |
| HOLLIDAY | E ALLEN | HOYT | TOM M |
| HOLLIS | JOHN E | HUBBELL | DOUGLAS |
| HOLM | CLIFFORD | HUCK | STEVE T |
| HOLMAN | ANDY J | HUDSON | DEBORAH J |
| HOLMAN | GENE | HUEBNER | KELLY |
| HOLMAN | LUKE C | HUFF | CARL O |
| HOLMES | BURT A | HUFT | SCOTT J |
| HOLMES | CLIFFORD A | HUGHES | DAVID R |
| HOLMES | DAVID M | HUGHES | TOM F |
| HOLMGREN | JOHN L | HULTENG | ERIC |
| HOLT | JAMES T | HUMMEL | JAMES J |
| HOLT | ROGER | HUNGERFORD | FRANCIS |
| HOLWEGNER | DAN M | HUNT | LEISETTE H |
| HOLWEGNER | HARLEAN S | HUNT | MARSHA L |
| HOLYCROSS | CHARLES H | HUNTLEY PROJECT SCHOOL | |
| HOLZER | TERRY M | HUNTLEY WATER & SEWER DISTRICT | |
| HOLZHEIMER | DON C | HUPPERT | FRED T |
| HONE | DON Z | HURD | DENNIS W |
| HOOD | WILLIAM J | HUSCHKA | DELORES L |
| HOOD | KELLY R | HUSKEY | JOHN D |
| HOOVER | JAMES E | HUST | DENNIS L |
| HOPE CHURCH | | HUSTAD | MARLON |

| Last Name | First Name | Last Name | First Name |
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| HUSTON | HAROLD | JELLISON | JEFFREY |
| HUTCHINS | JAMES A | JENKINS | ROLIN D |
| HUTSELL | WILLARD | JENKINS | HELEN H |
| HUTTON | CHRIS | JENKINS | LOUISE |
| HUTZENBILER | JAMES | JENKINS | JAMES D |
| HUYSER | WILLIAM J | JENNISON | DALE W |
| HYAMS | ANDREW C | JENSEN | ROBERTA E |
| HYBNER | EDWARD L | JENSEN | PATRICK J |
| HYEM | DALE | JENSEN | ROBERTA ANN |
| HYLLAND | LARRY M | JENSEN | OTTO E |
| HYNEK | FLOYD | JENSEN | LYNN M |
| IACOPINI | DAVID W | JENSEN | JAY E |
| ICELAND SOLE PROPRIETORSHIP | | JENSEN | GEORGE A |
| IFFLAND | KENNETH | JENSEN | GARY M |
| IFFLAND | KEVIN L | JENSEN | CLAY R |
| INDEPENDENT SCHOOL | | JENSEN | CHARLES O |
| INDIAN CREEK RANCH INC | | JERICHO HOME OWNERS | |
| INTERMOUNTAIN EQUESTRIAN | | JERMUNSON | CHRIS R |
| IRION | WADE | JERRY'S AUTO BODY AND PAINT | |
| ISOM | JEFFREY R | JESSEE | TERRY W |
| IVERSON | KAREN J | JETT | L CANDISS |
| IVERSON | AMY T | JIM'S EXCAVATING SERVICE INC | |
| IVERSON | DAVID V | JNJ ENTERPRISE BUILDER LLC | |
| IVERSON | THEODORE E | JOHANNES | NORMAN N |
| IVERSON | LEE | JOHANNES | KENNETH |
| IVERSON | CAP | JOHANNES | NOLAN |
| JACKSON | JAMES R | JOHANNES | CLINTON N |
| JACKSON | LA VONNE | JOHANNSSEN | GARY L |
| JACKSON | JOEL K | JOHANNSSEN | KAY J |
| JACKSON | KIT D | JOHANNSSEN GARY TRUCKING | |
| JACKSON | JOHN J | JOHNS | JIM A |
| JACKSON | ROBERT L | JOHNSON | ROBERT D |
| JACOBS | ROGER | JOHNSON | DAVID D |
| JACOBSON | ROGER | JOHNSON | HERB J |
| JACOBSON | RICHARD | JOHNSON | MICHAEL W |
| JACOBSON | RODNEY P | JOHNSON | FRED |
| JANIS | CLEMENT P | JOHNSON | ALAN S |
| JANSMA | W TODD | JOHNSON | ILA M |
| JANSSEN | JOHN | JOHNSON | GABRIEL N |
| JANY | DAVID M | JOHNSON | STAN D |
| JANZEN | RUSS E | JOHNSON | C ALLEN |
| JARES | JOHN E | JOHNSON | ROY W |
| JARES FENCE COMPANY | | JOHNSON | GREGORY A |
| JASINSKI | BILL R | JOHNSON | EDDY C |
| JEANROY | CALVIN | JOHNSON | RONALD E |
| JEFF ENGEL CONSTRUCT. | | JOHNSON | CARL |
| JELLISON | FRED L | JOHNSON | PETE |

| Last Name | First Name | Last Name | First Name |
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| JOHNSON | JERRY | K W HOLDINGS LLC | |
| JOHNSON | NEAL C | K W SIGNATURE HOMES | |
| JOHNSON | DALE | KAATZ | ANNETTE |
| JOHNSON | GLENN | KAGARISE | LARRY G |
| JOHNSON | KLEMENS J | KAISER | JEROME |
| JOHNSON | MARVIN L | KAISER | JERRY L |
| JOHNSON | SCOTT | KAIZER | WILLIAM J |
| JOHNSON | LARRY A | KALAMAJA | LEO |
| JOHNSON | KEVIN | KALE | TRENT A |
| JOHNSON | MICK | KALVIG | RON D |
| JOHNSON | PAUL G | KAMMINGS | JAMES E |
| JOHNSON | JOE D | KANTA | JOE J |
| JOHNSON | EILEEN F | KAPFER | JASON S |
| JOHNSON | ROY M | KAPPEL | ROBERT A |
| JOHNSON | RICK | KAPPEL LLC | |
| JOHNSON | CARROLL W | KAPPTIE | WILLIAM |
| JOHNSON | JAMES | KAPSA | LINDA K |
| JOHNSON | KURT N | KARELL | ALLAN L |
| JOHNSON | CARL M | KARPSTEIN | STEVEN |
| JOHNSON LANE MATERIALS LLC | | KARST | MOLLY |
| JOHNSON MARK CONSTRUCTION LLP | | KARST | GARY W |
| JOHNSTON | THOMAS A | KASEMAN | CLAUDE D |
| JOHNSTON | BIRDIE D | KASEMAN | ELMER C |
| JOHNSTON | J R | KAUFMAN | SANDY |
| JOINES | WAVERLY E | KAUFMAN | LARRY |
| JONASSON | ROBERT E | KAUFMANN | ILAN H |
| JONES | JAMES L | KAULL | DON |
| JONES | LYLE E | KAUPISH | KIM |
| JONES | ALMA E | KAURIN | RON H |
| JONES | PAUL | KAUTZ | ELMER |
| JONES | ROBERT L | KAUTZMAN | CORNELIUS |
| JONES | RICK C | KAUTZMANN | DAVID D |
| JONES | JOHN D | KAWANE | WALLACE M |
| JONES | RON R | KAYLOR | DANNY D |
| JONES | DONALD E | KEEHN | SETH R |
| JONES | D PAUL | KEELE | WILLIAM R |
| JONES | RONALD V | KEELER | WENDELL |
| JONES | MICHAEL D | KEELING | JAMES R |
| JONES | FLOYD E | KEEVER | DON R |
| JONUTIS | STANLEY | KEEVER | DON C |
| JOPPA | DAVID | KEIM | VERN R |
| JORDAN | CHARLOTTE R | KELLER | GEORGE E |
| JORDAN | ALAN | KELLEY | F J |
| JORGENSON | JON SCOTT | KELLISON | TED |
| JOYCE | MIKE A | KELLY | CHERYL P |
| JUDSON | KATHLEEN M | KELLY | WILLIAM H |
| JUROVICH | EUGENE | KELLY | RANDY E |
| JUROVICH | ROBERT | KELLY | ROBERT |
| JUSSILA | NEIL R | KELLY | BARBARA J |
| K ... | BARBARA E | KELSEY | MARY |
| K R RAUCH COMPANY | | KELSEY | DAVID E |

| Last Name | First Name | Last Name | First Name |
|---------------------------|------------|-----------------|------------|
| KELSEY | CAROL M | KINGHORN | JOHN C |
| KEMBEL | RUSSELL | KINGHORN | JOHN H |
| KEMBEL | RAYMOND | KINGHORN | KEVIN R |
| KEMBEL | ELMER | KINNEY | ALBERT |
| KEMBEL | CARL | KINSEY | MIKE |
| KEMBEL | STEPHEN | KIRBY | NANCY C |
| KEMKES | JOHN | KIRKLAND | JAY |
| KEMPH | TRAVIS L | KIRSCHENMANN | KEVIN L |
| KEMPH | JOE | KISSEE | BRUCE A |
| KEMPH | LOIS M | KITCHIN | KEVIN P |
| KEMPH | JOE Q | KITT | ALICE A |
| KEMPH LAND & LIVESTOCK CO | | KJORSTAD | KEN L |
| KENEALLY | PAUL E | KLAMERT | CHRIS |
| KENEALLY | KATHY | KLEIN | MARK A |
| KENNEDY | MARK C | KLEIN | KEN |
| KENNEDY | GEORGE B | KLEIN | TODD J |
| KENNEDY | TERRY L | KLEIN | LYNN L |
| KENNEY | LARRY J | KLEINSASSER | RONALD |
| KENT | THOMAS F | KLEINSASSER | JERRY |
| KERN | FRANK | KLEVGARD | VERN D |
| KERN | TINA M | KLINER | KENT H |
| KERN | ROB W | KLUKSDAHL | MARK D |
| KERNS | KRAYTON | KLUNDT | KEVIN |
| KERO | ANNE F | KNAPP | FRANK T |
| KERR | KRISTINE L | KNAPP | MASON |
| KERR | VALERIE | KNAUB | RAYMOND |
| KERR | JEAN M | KNAUB | ROGER J |
| KESLER | ROGER J | KNAUB | WILLIAM E |
| KESLER | RONALD E | KNAUB | JOSEPHINE |
| KETCHUM | SAMUEL J | KNEIB | CHARLES M |
| KETTENACKER | JEROME A | KNERR | KIM L |
| KETTERLING | RICK A | KNICKERBOCKER | CHRIS C |
| KETTERLING | HAROLD E | KNICKERBOCKER | ROBERT |
| KETTERLING | DELORES | KNOX | DAVID B |
| KETTERLING | STEVE A | KNOX | GEORGE E |
| KETTERLING | MORRIS | KNUST | SHARON M |
| KETTERLING | GERALDINE | KNUTH | RONALD A |
| KETTERLING | WILLARD | KNUTSON | JERRY D |
| KIDDER | TOM K | KNUTSON | TOM C |
| KIEDROWSKI | GORDIAN E | KOBELT | DARRELL |
| KIEFER | MICK J | KOBER | VIRLA I |
| KILROY | MICHAEL A | KOBER | ALVIN C |
| KILWEIN | JEFFREY A | KOBER | PAUL M |
| KIMBALL | ROBERT W | KOBER | ANDY P |
| KIMBALL | DAVID G | KOBER | THEODORA W |
| KIMMEL | FLOYD | KOBER FARMS INC | |
| KIMMEL | CLEVE | KOBER FARMS INC | TERRY |
| KINDER | SUE | KOCH | DANIEL E |
| KING | LORRAINE M | KOCH | JERRY |
| KING | JAMES | KOCH | ARNOLD |
| KINGHORN | RALPH E | KOCH | PHILIP |

| Last Name | First Name | Last Name | First Name |
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| KOCIAN | MICHAEL J | KRELL | KENNETH R |
| KOERBER | KEVIN M | KRENELKA | PETER E |
| KOFFLER | ROBERT | KREPS | RICHARD P |
| KOK | MICHAEL D | KRIEGER | EUGENE |
| KOLENDICH | FRANK | KRIEGER | JOHNNY |
| KOoyer | RICHARD L | KRIVONEN | WES M |
| KOPMAN | WESLEY L | KRKOSA | PAT |
| KOPP | JUSTIN | KROLL | DUANE E |
| KORELL | BRIAN D | KRONE | MARVIN J |
| KORELL | CARL E | KRUEGER | JAMES A |
| KORN | DIRK C | KRUG | DENNIS |
| KORTH | STUART A | KRUG | ADAM |
| KORTHUIS | DUANE R | KRUG | MARY |
| KORWALD | MORRIS | KRUG | HENRY |
| KOSMICKI | ROD L | | KRUG |
| KOSTELECKY | RONALD | KRUG | WILLIAM |
| KOSTENKO | CLARENCE | KRUG | JAY |
| KOSTER | CHARLES R | KRUG | CHUCK |
| KOUBA | LANCE M | KRUM | JAMES |
| KOUBA | RICHARD R | KRUM | CAROLYN |
| KOUNS | MARY JANE | KRUM | JASON L |
| KOVACH | AGNES M | KRUM | DANIEL L |
| KOWALSKI | PAUL D | KRUM | JULIE A |
| KOZAKOFF | DIMITRI | KRUMHEUER | RAYMOND |
| KPG8 88.3 PRYOR GOSPEL RADIO | | KUCH | EDDIE H |
| KRAFT | JOSHUA A | KUCK | HARVEY |
| KRAFT | FRIEDA | KUDRNA | BEVERLY |
| KRAFT | RICK E | KUEHNER | VERN E |
| KRAFT | LESLIE | KUHLMAN | JOHN L |
| KRAFT | ROBERT E | KUKLOK | GORDON L |
| KRAFT | JAMES L | KUKOWSKI | DICK |
| KRAFT | BRUCE G | KUKOWSKI | JACK |
| KRAFT | EDWIN | KUKOWSKI | STEVE |
| KRAFT | MICK M | KUKOWSKI | CHANCE L |
| KRAFT | BRAD | KULBECK | PHILLIP N |
| KRAFT | DENNIS J | KUMETAT | WILLIAM F |
| KRAFT | CAROL M | KUNNEMANN | KON H |
| KRAGT | MIKE | KUNTZ RANCH | |
| KRAGT | JOHN | KUNZ | KENNETH A |
| KRAMER | CAROL S | KUNZ | KEN A |
| KRAMER | MICHAEL J | KUPER | LONITA C |
| KRAMER | CYNTHIA | KURKOSKI | NOEL T |
| KRAMER | JASON S | KUSKE | RICHARD J |
| KRAMER | JOHN P | KUYKENDALL | SHIRLEY |
| KRAMER | RAYMOND J | KUYKENDALL | W BEECHER |
| KRAMER | DENNIS L | KVILHAUG | RON J |
| KRAMER CROWDER TRUST | | KYHL | RANDY L |
| KRANK | GERALD | LARDIS | BILL |
| KRANK | JACOB C | LA COUNTE | DARRYL |
| KREBILL | ROY | LA FRANCE | VAL |
| KREITZBERG | DEAN E | LA MOTTE | DONALD A |

| Last Name | First Name | Last Name | First Name |
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| LA PERLE | BOB E | LARSON | WAYNE H |
| LA RANCE | CHRISTINE M | LARSON | BRUCE A |
| LABER | STUART | LARSON | PAULETTE |
| LACKMAN | JEAN P | LARSON | JAMES L |
| LACKMAN | JACK L | LASATER | PAUL |
| LACKMAN | DAN E | LASLEY | KEITH A |
| LACKMAN | STEVEN | LATTA | GEORGE |
| LACKMAN | WILLIAM C | LATTERELL | FAYETTE |
| LACY | CLARECE M | LAUBACH | LANCE M |
| LADD | ROY E | LAUREL AIRPORT | |
| LAFERRIERE | DARLENE F | LAUREL FARMERS MKT | |
| LAGGE | RICHARD | LAUREL SADDLE CLUB | |
| LAHN | GLENDA H | LAUREL SOFTBALL ASSN | |
| LAKKO | SHERRY | LAUSCH | NANCY J |
| LAMBERT | SCOTT A | LAUVER | DANIEL S |
| LAMBERT | STERLING R | LAVERDURE | PATRICIA |
| LAMBERT | STAN | LAVOLD | CALVIN |
| LAMBORN | ROLLAN J | LAVOLD | RICHARD |
| LAMBRECHT | DAVE P | LAW | JOHN |
| LAMBRECHT | EDWARD | LAWLER | MARK D |
| LAMBRECHT | RAY | LAWRENCE | GARY L |
| LAMBRECHT | JACK R | LAWRENCE | WILLIAM J |
| LAMBRECHT CONSTRUCT. | | LAWSON | JAMES D |
| LAMEY | ARTHUR F | LAWSON | CAROL J |
| LAMM | FRANK R | LAWVER | TERRY |
| LAMMERS | SCOTT M | LE BRUN | BRENDA |
| LAMPERT | JIMMIE S | LE CABINET SHOPPE INC | |
| LANCE | STNALEY W | LE CLAIRE | FRANCES B |
| LANCE | ROSE | LE DUC | GORVAN M |
| LANCE | JAMES E | LE DUC | GORVAN J |
| LANCE | CARY L | LE FEBVRE | COLLEEN J |
| LANCE | STEPHEN W | LEACH | IRVING R |
| LANDE | WILMA | LECHNER | KIM P |
| LANDE | JEAN A | LEE | DONALD B |
| LANDWEHR | ALAN E | LEE | TERRY A |
| LANE | BERT E | LEE | LENDAL R |
| LANE | EVERETT G | LEE | RONALD K |
| LANG | KATHY JO | LEE | ROD W |
| LANGFORD | DAVID P | LEE | ALAN O |
| LANGVE | DIANE | LEEDHAM | ARLEDA |
| LANIER | CHARLES R | LEEDHAM | JUSTIN A |
| LANTIS | TY M | LEEDY | MARLA G |
| LANTZ | THOMAS M | LEENKNECHT | TONY W |
| LARDY | GLENN | LEES | ELVA M |
| LARIMER | JOE A | LEFFERS | JEFF |
| LARNED | DAVID | LEFLER | BOBBIE L |
| LARSEN | LYNN A | LEGARE | RANDOLPH |
| LARSEN | WENDY L | LEGERSKI | CHARLES J |
| LARSON | TODD D | LEGGETT | CORI L |
| LARSON | CAMERON C | LEGLER | RON D |
| LARSON | JOHN W | LEHENBAUER | NORBERT C |

| Last Name | First Name | Last Name | First Name |
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| LEHFELDT | JEFF | LINDEEN | DAVID B |
| LEHFELDT | O G | LINDELL | MARY J |
| LEHM | ROBERT C | LINDELL | RODNEY B |
| LEHMAN | MICHAEL | LINDELL | J W |
| LEHMAN | TIM G | LINDSAY | REGGIE L |
| LEIKAM | LARRY L | LINDSEY | LEE |
| LEISTIKO | DENNIS M | LINDSEY | LANA R |
| LEMIEUX | HENRY J | LINDSEY | JOHN W |
| LEMON | GREG D | LINGER | EARL |
| LENHARDT | FREDERICK | LINGER | BILLY ROY |
| LENHARDT | RICHARD W | LINGER | LLOYD F |
| LENNICK | ROGER | LINGOHR | CHERYL E |
| LENNING | MITCH | LINK | JOE |
| LENT | MARK | LINN | JANICE |
| LENTZ | EDWARD W | LINZA | DARREN M |
| LENZ | WILLARD H | LITTLE | SHIRLEY A |
| LEONE | ROBERT J | LITTLE WOLF | KRISTI M |
| LEPLEY | WILLIAM L | LITTLER | AL |
| LESLIE | MITCH | LLANA | ROBERT L |
| LESTER | ROBERT L | LLEWELYN | THOMAS |
| LESTER | SHIRLEY I | LLOYD | JAMES V |
| LESTER | SCOTT J | LMRSM LLC | |
| LESTER | DANIEL V | LOBER | WALTER M |
| LETCHER | VAL | LOCKER | STEPHANIE R |
| LETZ | PHILIP | LOCKER | CHARLES S |
| LEUENBERGER | EDDY D | LOCKWOOD | GORDON |
| LEUTHOLD | WILLIAM E | LOCKWOOD AUTO & TRUCK SERVICE | |
| LEVIS | SAM A | LOCKWOOD CENTER | |
| LEWIS | BENNY L | LOCKWOOD RURAL FIRE | |
| LEWIS | WILLIAM E | LOCKWOOD VETERINARY SERVICE | |
| LEWIS | RAY D | LOCKWOOD WATER & SEWER | |
| LEWIS | MARTINA E | LOENDORF | TYRONE B |
| LEY | JOHN | LOGAN | JAMES E |
| LICH | MELVIN F | LOGAN | MORGAN E |
| LIDDELL | ROBERT E | LOGAN | RANDALL C |
| LIE | HAAKON | LOHRENTZ | RICHARD |
| LIENEMANN | RYAN L | LOHRENTZ | DON |
| LIEVENS | MARC A | LOMAX | JAMES A |
| LIGHT | JACK W | LONG | CHARLES J |
| LIGHT | PETER J | LONG | ROBERT R |
| LILLEBERG | SEAN A | LONGMIRE | ALMA L |
| LILLEBERG | PHILIP A | LONSBERRY | DOROTHY |
| LILLEY | WILLIAM L | LOOSE | JACK L |
| LILLIE | SCOTT | LOPEZ | DAVID |
| LIMPP | MARCELLA A | LOPEZ | ISIDRO L |
| LIMPUS | MIKE | LORANG | HARRIET |
| LINAHON | JERRY | LORANG | JOHN P |
| LIND | JASON C | LORD | CURTIS A |
| LINDAL | JAN L | LORD | JOHN W |
| LINDEEN | PHYLLIS J | LORD-FISHER | LINDA |

| Last Name | First Name | Last Name | First Name |
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| LORENTZEN | G BRUCE | MADDEN | BERT |
| LORENZ | JAMES E | MADDOCK | LANE K |
| LOTERBAUER | GREGORY G | MADILL | BRYAN S |
| LOUDERMILK | WELDON B | MADILL | WILLIAM F |
| LOUIS | WARREN D | MADSEN | DAVE M |
| LOVE | RICKEY E | MAGNUSON | ROSS D |
| LOVE | DONALD R | MAHAN | ETHEL |
| LOVE | PAUL | MAHN | KURT E |
| LOVE | JOSEPH D | MAHON | DAVE G |
| LOVE | WAYNE | MAHON | MICHAEL J |
| LOVELESS | ROBERT S | MAHONEY | CLIFF J |
| LOVELY | DOUGLAS W | MAIDEN | GALE |
| LOWE | RUSS | MAIER | LYDIA |
| LOWE | HENRY J | MAILLOUX | BRAD D |
| LOWE | MARK | MAILLOUX | KELLY D |
| LOWE | RANDY LOUISE | MAITLAND | MICHAEL G |
| LOWE | ROBERT E | MAJOR | SCOTT |
| LOWELL | TOM M | MAKEEFF | GLADYS N |
| LOWERY | CHIP W | MALKUCH | JOE D |
| LOYNING | JAMES B | MALL | JOHN E |
| LUBKE | LANCE L | MALLORY | JAMES H |
| LUCAS | MICHAEL W | MALMSTROM | SUSAN |
| LUDERMAN | VERNON L | MALMSTROM | TODD T |
| LUDINGTON | EDWIN M | MALMSTROM | THOMAS F |
| LUDLUM | GARY L | MALSOM | MARK |
| LUDWIG | MICHAEL L | MALVEY | D A |
| LUENEBURG | SUSAN M | MAMAYEK | BRYAN |
| LUHMAN | KAREN | MANDELLA | ANGELA T |
| LUND | STEVEN R | MANFULL | ARLO D |
| LUNDELL | STEVE | MANGEN | MICHAEL T |
| LUTERBACH | DON H | MANGOLD | SANDIE M |
| LUTTSCHWAGER | K L | MANGOLD | JAMES A |
| LYNAM | LARRY | MANGUM | BILL |
| LYNCH | KEVIN M | MANGUS | SHON C |
| LYNCH | CHARLES H | MANLEY | BYRNE J |
| LYNG | RICK J | MANSFIELD | MICHAEL G |
| LYON | ROBERT H | MANWEILER | RAYNOLD J |
| LYONS | DALE R | MARCOTTE | RICHARD D |
| LYYTINEN | LARRY | MARES | TIMOTHY R |
| LYYTINEN | MARVIN | MARKEGARD | RODNEY P |
| M & C GROCERY INC | | MARKEGARD | HARVEY K |
| M & R WATERPROOFING | | MARKEGARD | LOIS C |
| M SQUARED ACRES | | MARKEGARD | JOHN |
| MAART | NANCY | MARKEGARD L & L INC | |
| MABRY | ESTER | MARKEGARD RIMROCK FARMS LP | |
| MAC CATHERINE | SHAWN M | MARKLEY | RONALD L |
| MAC LACHLAN | GARY W | MARKUSON | BRENDA K |
| MACCHIAVELLO | CARLO | MAROULIS | JAMES |
| MACE | FRED J | MARQUART | PETER J |
| MACHADO | RONALD M | MARQUART | ARNOLD |
| MACKENZIE | ROBERT J | MARQUEZ | STEPHEN E |

| Last Name | First Name | Last Name | First Name |
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| MARSH | JIM | MC CARTNEY | J G |
| MARSHALL | CRAIG S | MC CARTY | MICHAEL F |
| MARSHALL | AMY C | MC CAULEY | LAURIE D |
| MARTIN | WILLIAM L | MC CAULEY | ELAINE |
| MARTIN | ROBERT E | MC CLEARY | JOHN D |
| MARTIN | HAROLD E | MC CLURE | SHANNON J |
| MARTIN | ALBERT J | MC CLURG | DONALD G |
| MARTINEZ | DAVID | MC COMAS | LAVERNE F |
| MARTINEZ | EVERETT | MC COMAS | LESLIE |
| MARTINSON | GOODWIN A | MC COMB | STACY |
| MARTINSON | MATT | MC COMISH | KENNETH A |
| MARTINSON | SHELLY L | MC CONKEY | JON A |
| MARTINSON | EDDY | MC CORMICK | THOMAS E |
| MARTINSON | MARIANNE | MC CORMICK | R ALLEN |
| MARTISAK | FRANCES M | MC COY | JOE |
| MARTONEN | CHAD E | MC COY | MIKE |
| MASCARENA | CLAYTON | MC CRANIE | NATHAN H AND |
| MASEBERG | MIKE | MC CRONE | SAM E |
| MASON | BETTY | MC CUIN | WILLIAM G |
| MASSAR | MONTE | MC CUNE | DANIEL |
| MASSIC | ROBERT D | MC DONALD | DEBRA D |
| MASTERSON | SUSAN | MC DONALD | PATRICK A |
| MATHISON | ANDREA M | MC DONALD | JEFF M |
| MATRIARCH CONSTRUCTION INC | | MC DONALD | DONALD R |
| MATTFELDT | MICHAEL | MC DOUGALL | RICK |
| MATTHEIS | MARY H | MC ELVAIN | ROLAND |
| | | MC FADDEN | |
| MATTHEWS | SUZANNE R | CONSTRUCTION INC | |
| MATTHIES | HANK | MC FARLAND | BRUCE E |
| MATTSON | JACK D | MC FARLAND | THEODORE C |
| MATZ | JOHN M | MC FARLAND | CHARLES |
| MAUCH | MARTIN | MC FARLAND | JOHN E |
| MAURER | TOM | MC FARLAND | CLINTON L |
| MAURER | PHILIP D | MC FARLAND | GARY |
| MAURITZSON | ANNA M | MC FARLAND | DAVID |
| MAVITY | MONTE R | MC FARLAND RANCH INC | |
| MAXWELL | CHARLES R | MC FARLANE | TOBIN A |
| MAXWELL | KATHY A | MC FARLANE | GLEN |
| MAY | JOHN G | MC FATE | DAVID R |
| MAY | JASON D | MC FERRAN | EUGENE |
| MAYES | GARY | MC GAHAN | CHARLES F |
| MAYES | JOE A | MC GINNIS | JOE E |
| MC ARTHUR | TERRY J | MC GLOTHLIN | CHARLES E |
| MC BRIDE | RICHARD | MC GOUGH | DANIEL |
| MC BRIDE | TOM | MC GRAIL | RONALD |
| MC BURNEY | SCOTT D | MC GRAW | ROGER M |
| MC CABE | DONALD W | MC GRAW | GERALD R |
| MC CAFFREE | ROBIN M | MC GREW | D SEAN |
| MC CAFFREE | MARLIN R | MC GREW | TIM H |
| MC CARTHY | MIKE L | MC ILVAIN | BILL |
| MC CARTHY | MICK S | MC INTOSH | JAMES L |

| Last Name | First Name | Last Name | First Name |
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| MC INTOSH | WILMA | METZKER | RONALD D |
| MC KEEVER | TODD M | MEYER | KENNETH J |
| MC KELVIE | RALPH E | MEYER | RONALD W |
| MC KENNEY | JAMES | MEYER | MICHAEL R |
| MC KENZIE | MAGARET A | MEYERS | STEPHEN L |
| MC KENZIE | CORY S | MICHAEL | WILLIAM G |
| MC KERLICK | TOM | MICHAEL | WILLIAM |
| MC LARNON | GLADYS M | MICHAEL | HARRY |
| MC LENNAGHAN | DON A | MICHAEL | ALAN W |
| MC LEOD CONSTRUCTION | | MICHAEL | STEVEN J |
| MC MAHON | LARRY D | MICHALIES | KELLY G |
| MC MANAMEN | VICKI J | MICHELS | JERRY |
| MC MILLAN | BOYD M | MICHELS | RAY E |
| MC MILLEN | ALLEN W | MICKULIN | STEVE |
| MC MILLEN | TIM A | MIDDLETON | JOSH J |
| MC MULLEN | THOMAS E | MIDDLETON | J R |
| MC MULLIN | KENNETH D | MID-VALLEY TIRE & LUBE | |
| MC NEILL | VALERIE A | MIELKE | RANDOLPH |
| MC NIVEN | DENNIS | MIELKE | DENNIS |
| MC NULTY | JUDIANN | MIKKELSON | KEN R |
| MC NULTY | NANCY E | MILL | EDWARD J |
| MC QUIRE | SAM | MILLER | GARY L |
| MC RAE | SCOTT | MILLER | JOE |
| MC SWEYN | WILLA JEAN | MILLER | MAX F |
| MC SWEYN | ROBERT | MILLER | BILL |
| MEACHAM | CRAIG V | MILLER | DEBBIE K |
| MEACHUM | FRANK M | MILLER | ELVIN T |
| MEGORDEN | CRAIG R | MILLER | LYNDA L |
| MEHLING | RICK A | MILLER | MELVIN L |
| MEHRER | RAY R | MILLER | JOSEPH A |
| MEIER | CRAIG B | MILLER | ROBERT A |
| MELBY | EDWARD J | MILLER | ROBERT J |
| MELCHER | H ED | MILLER | SANDRA K |
| MELING | TODD A | MILLER | MATTHEW V |
| MELONI | MICHAEL P | MILLER | BERNARD |
| MELVILLE | RICHARD A | MILLER | DAVID |
| MELVIN | RANDY L | MILLER | JONATHAN S |
| MENGE | HENRY W | MILLER | GENE |
| MERCHEN | LOUIS J | MILLER | JEFF P |
| MERKES | GERALD | MILLER | GERALD L |
| MERON | RICK J | MILLER | PHYLLIS E |
| MERRIFIELD | MARTY | MILLER | KEVIN R |
| MERRILL | CHRIS D | MILLER | KENNETH L |
| MERTZ | JAMES | MILLER | DARRIN K |
| MERYMAN | WILLIAM A | MILLIKEN | DANIELLE |
| MESSERSCHMITT | MARK L | MILLIKEN | LOUIS R |
| MESSICK | GARY C | MILLS | KENNETH |
| METTES | FRANK S | MILMINE | DON V |
| METZGER | TIM | MINI | MERC |
| METZGER | EUGENE A | MINKOFF | RANDY J |
| METZGER | MARVIN J | MINSTER | TANA |

| Last Name | First Name | Last Name | First Name |
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| MINTLING | KENNETH C | MORKEN | KURTISS B |
| MISHLER | REX | MORRIS | STANLEY K |
| MISHLER SALES INC | | MORRIS | RICHARD M |
| MISSION CREEK LAND AND CATTLE | | MORRIS | RANDY |
| MITCHELL | DON D | MORRIS | WILLIAM J |
| MITCHELL | JAMES | MORRIS | SANDRA A |
| MITCHELL | BURTON | MORRISON | SCOTT A |
| MIZELL | BILL | MORRISON | THOMAS A |
| MOBERLY | MARJORIE | MORSE | MARK E |
| MOEDL | COLTER M | MORSE | WALTER D |
| MOEN | DAVE | MOSDAL | THELMER |
| MOFFET | RICCI | MOSDAL | JARRED I |
| MOGENSEN | RICHARD | MOSEMAN | RICHARD D |
| MOHICAN | WEST | MOSER | ROBERT L |
| MOHR | MARTIN | MOTHERSHEAD | MILTON |
| MOHR | JOHN W | MOTHERSHEAD | WILLIAM |
| MOHR | DONALD D | MOULLET | TIM J |
| MOHR MINOR SUBDIVISION | | MOUNTAIN MECHANICAL INSULATION | |
| MOLER | DIRK E | MUELLER | KIMBERLY J |
| MOLINE | WILLIAM A | MUELLER | JERROL K |
| MOLT HOMECRAFT CLUB | | MUILENBURG | ROLLAND L |
| MONDRAGON | CHERIE A | MUIR | PATTY |
| MONSON | STAN | MUNIS | JOHN R |
| MONSON | STEVE D | MUNSON | TIMOTHY J |
| MONTANA TERRITORY MEATS | | MURFITT | ROBERT J |
| MONTOYA | JOSEPH R | MURPHREY | MARIAN L |
| MOON | DENNIS J | MURPHY | DANIEL J |
| MOON | DAVID J | MURPHY | CHARLES H |
| MOORE | JACK | MURPHY | LYNN J |
| MOORE | BRUCE E | MURPHY | JERRY |
| MOORE | LAURIE LEE | MURPHY | GERALD B |
| MOORE | JOHN K | MURPHY | FRANK J |
| MOORE | EDWIN R | MURRAY | SHAWN C |
| MOORE | RONALD E | MURRAY | H DON |
| MOORE | HARRY | MURRY | DUANE |
| MOORE BROTHERS | | MUSGJERD | LINDA J |
| MOOTS | MORRIS C | MUTTER | ALVIN L |
| MOOTS | MARION | MUUS | JEFF |
| MOOTS | WOODROW | MYERS | SCOTT G |
| MORALES | GONSALO V | MYERS | JAMES SHANE |
| MORAN | TRAVIS E | MYERS | BRYON T |
| MORDEAUX | CORRY | MYERS | DIANE M |
| MORE CONSTRUCTION INC | | MYERS | LEE |
| MOREHOUSE | CLIFFORD | MYHRE | KYLE E |
| MORGAN | PHILIP L | MYHRE | RALPH D |
| MORGAN | KENT | MYHRE | MARILYN I |
| MORGAN | BOB | MYHRE LAND COMPANY | |
| MORGAN | L W | NACE | SIS |
| MORIN SCHOOL | | NAFTS | MELVIN L |

| Last Name | First Name | Last Name | First Name |
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| NAGEL | JOHN A | NICK | JOHN M |
| NAGRODSKI | LESLOW A | NICKEL | TOM |
| NANCE MIKE CONSTRUCT. | | NICKLESS | DAVE J |
| NARANCICH | JERRY W | NICKOLOFF | KENNETH J |
| NASH | F VERNON | NICOL | GREGG |
| NATION | TATE W | NIELSEN | TRENT W |
| NAUMAN | RICHARD A | NIELSON | DAN |
| NAVE | DONALD L | NIENABER | FRANK H |
| NEAELY | MONTY | NIENABER | FRANK H |
| NEARPASS | BRIAN D | NILES | BOB L |
| NEBEL | JACKIE A | NILES | NINA L |
| NEESE | KEVIN D | NITSCHKE | JOYCE |
| NEHER | JACK K | NIXON | STEVEN V |
| NEIBAUER | ELSIE | NOEL | DAN |
| NEIBAUER | JAMES D | NOLAN | DAVID E |
| NEIBAUER | KENNETH W | NORDQUIST | JERRY R |
| NEIBAUER CONSTRUCTION CO INC | | NORLING | CARY E |
| NEIL | CHRIS | NORMAN | WAYNE |
| NEILL | AMY D | NORRIS | SHERYL L |
| | | NORTHERN SKIES AVIATION | |
| NELSON | ROGER G | | |
| NELSON | SHAWN D | NORTON | BRIUCE D |
| NELSON | SHELDON R | NORTON | JOHN |
| NELSON | ANDREW C | NORTON | BERNADETTE |
| NELSON | THERESA | NORTON | RAY |
| NELSON | GERALD K | NORWOOD | CRAIG S |
| NELSON | KENNETH R | NORWOOD | NORMA |
| NELSON | WILLIS M | NOTT | LENROY F |
| NELSON | DAVID | NOVAK | STAN |
| NELSON | LAURENA L | NOVAKOVICH | KEITH A |
| NELSON | MICHELLE E | NUNEMAKER | RALPH |
| NELSON | GEORGETTE C | NUXOLL | WALTER |
| NELSON | WAYNE W | NYMAN | TOM |
| NELSON | ED | NYSTROM | JOHN L |
| NEMITZ | WARREN | O BRIEN | MICHAEL |
| NESOVIC | JOHN | O CONNELL | DONALD |
| NESS | STEVE C | O DELL | LARRY G |
| NESSAN | TIM | O DONNELL | LARRY S |
| NEVE | RICHARD A | O DONNELL | HARLEY |
| NEW APOSTOLIC CHURCH | | O NEAL | CHAROLETTE E |
| NEWBY | FLETE C | OAKLAND | JERRY |
| NEWELL | BILL A | OBERG | JOSEPH O |
| NEWELL | KYLE B | OBERG | EDWARD |
| NEWKIRK | W JOHN | OBERG | MIKE T |
| NEWLIN | ED L | OBERG | EDWARD |
| NEWMAN | JAMES B | OBERLY | DAVID E |
| NEWPOWER | SCOTT J | OBLANDER | ROGER S |
| NICHOLAS | WESLEY B | OBLANDER | TOM |
| NICHOLS | CISCO | OBLANDER | DAN R |
| NICHOLS | JIM E | OBLANDER | CLAYTON |
| NICHOLSON | GARY | OBLANDER | DORIS L |

| Last Name | First Name | Last Name | First Name |
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| OBLANDER | JIM | OSTERMILLER | LINDA K |
| OBLANDER | WALTER | OSTERMILLER H L CONSTRUCTION | |
| OBLANDER | TIM | OSTLUND | HAL |
| OBLANDER | WILLY A | OSTLUND | JOHN |
| OCHSNER | ROBERT | OSTWALT | WARREN D |
| O'DONNELL | RON W | OSTWALT | JOHN C |
| OEDEKOVEN | MICHAEL | O'TREMBA | JAMES J |
| OHLIN | RONALD E | OTT | STACY S |
| OHMAN | GARY L | OTTESON | DANNIE L |
| OJEDA | N ANTONIO | OTTESON | CHERYL A |
| OKSNESS | RICHARD | OTTUN | JON |
| OLIVER | MIKE | OUDKIRK | JAMES T |
| OLMSTEAD | GAYLEN | OUKROP | WAYNE J |
| OLSEN | PAUL G | OUR REDEEMER LUTHERAN CHURCH | |
| OLSEN | ERIC H | OWEN | TIMOTHY P |
| OLSEN | ALLAN C | OWEN | STEVE |
| OLSEN | KENNETH L | OWEN | LEONARD J |
| OLSEN | PETER E | PABICH | AMANDA L |
| OLSEN | ROBERT | PACKARD | MARILYN |
| OLSEN | A KRISTINE | PADDEN | BRETT E |
| OLSEN | CLYDE | PADDOCK | TODD A |
| OLSON | JAMES D | PADGETT | RAYMOND A |
| OLSON | DAVID L | PADILLA | JESSE |
| OLSON | WALLACE L | PADILLA | RONALD |
| OLSON | LAURAL | PAFFRATH | DARWIN D |
| OLSON | MARTIN E | PAINTER | KENNETH E |
| OLSON | RONALD L | PAINTER | HASSELL W |
| OLSON | RAYMOND G | PALMER | FRED |
| OLSON | JEFF J | PALMER | APRIL L |
| OLSON | BRYAN D | PALMER ENTERPRISES | |
| ONSTAD | LORNE L | PARAMOUNT LOG HOMES | |
| OPENSHAW | ANJE | PARDIS | VICTORIA |
| OPENSHAW | LISA M | PARKER | HENRY L |
| OPP | STEVE R | PARKER | STEVEN M |
| OPPERUD | WAYNE J | PARKIN | VALERIE |
| ORELUP | LYLE | PARRISH | KRISTY L |
| OROZCO | FRANK L | PARSONS | NANCY A |
| ORTH | LEONARD B | PARSONS | MIKE V |
| ORTNER | BONNIE L | PASCAL | STEVE |
| ORTSCHEID | RONALD K | PASEK | MICHAEL T |
| OSBORNE | WES R | PATIAN | ROBERT L |
| OSBORNE | WES R | PATTERSON | MARK W |
| OSGOOD | DON | PATTERSON | PAT |
| OSMUNDSON | HOWARD B | PATTERSON LAND & LIVESTOCK CO. | |
| OSNESS | DALE | PATTERSON REPORTING SERVICES | |
| OSTER | DONNA M | PAUL | RICHARD A |
| OSTERMILLER | ROBERT S | PAULEY | D RICHARD |
| OSTERMILLER | STEVEN J | PAULSEN | GLENN |
| OSTERMILLER | RANDY H | PAULSON | LARRY K |

| Last Name | First Name | Last Name | First Name |
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| PAWN PLUS | | PETERSON | JOHN A |
| PAYER | FRANCIS B | PETERSON | ERIC D |
| PAYOVICH | GEORGE D | PETERSON | JOHN A |
| PAZ | NASH | PETERSON | LONNIE L |
| PEABODY | LARRY | PETERSSON | RICHARD |
| PEARLIE LEE & COMPANY | | PETTERSON | MYRON A |
| PEARSON | RONALD | PETTY | MELVIN T |
| PEARSON | EVA E | PETTY | JOHN D |
| PECARINA | RONALD | PFEIFER | MELANIE S |
| PECINOVSKY | LISA A | PHELPS | JAMES E |
| PECK | BRETT A | PHILHOWER | JERRY L |
| PECK TRANSPORT | | PHILHOWER | JAMES H |
| PEDERSEN | MICHELE A | PHILLIPS | CANDACE R |
| PEDERSON | JOAN E | PHILLIPS | SUE |
| PEGAR | DUANE A | PHIPPS | JAMES L |
| PEHL | DENNIS B | PICARD | SAM |
| PEILA | SAM P | PICKETT | JOHN S |
| PEILA | MATT S | PIERCE | ANTHONY R |
| PELKEY | FRANK D | PIERCE | ROBERT L |
| PELTZER | ALBERTA M | PIERCE | FRED C |
| PEMBERTON | DOUG | PIERCE | DAVID G |
| PENA | GERALD A | PIERCE | PAULINE |
| PENDILL | GORDON | PIERCE | ROBERT L |
| PENNINGER | GARY | PIERRY | RUSSELL W |
| PENNINGTON | JAMES S | PIETTE | MARY A |
| PENTECOST | CHARLES | PIETZ | KEN A |
| PENWELL | LEWIS F | PINKERTON | JOHN J |
| PEPIN | JACQUELINE J | PIPAL | RANDY E |
| PERALEZ | BENTURA | PIPER | GREG |
| PEREY | LYNN | PIPINICH | A J |
| PERISIC | HILDEGARD M | PISK | DUANE R |
| PERKEREWICZ | GARY | PITMAN | ALBERT |
| PERKINS | ROGER J | PIVONKA | CARL E |
| PERKINS | ELAINE | PLACE | WILLIAM |
| PERRIGO | LEE W | PLAGMANN | RICHARD |
| PERRIN | MARYNELL | PLATH | ARTHUR T |
| PERRIN | DOROTHY L | PLENINGER | LES R |
| PERRO | EDWARD J | PLETCHER | RON |
| PERRY | RANDY | PLOOSTER | JOAN |
| PERSONETT | THOMAS J | PODOLAK | RONALD F |
| PETERS | JAMES R | POGUE | GARY |
| PETERS | JOE A | POINTER | THOMAS |
| PETERS | MICHAEL R | POLLERT | JAMES C |
| PETERS | GARRY G | POLLUCK | STEPHEN W |
| PETERSEN | STEVE K | POMPEYS PILLAR POST OFFICE | |
| PETERSON | RANDALL R | PONCE | ALICE R |
| PETERSON | HAROLD A | POND | W E |
| PETERSON | MARK A | POND | CURTIS |
| PETERSON | RICHARD L | POPE | JAMES V |
| PETERSON | BERNELL J | POPELKA | RONALD E |
| PETERSON | DON | POPELKA | A EDWARD |

| Last Name | First Name | Last Name | First Name |
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| POPP | ROBERT A | R M PROPERTIES | |
| POPP | EDWARD R | R S AUTOMOTIVE | |
| PORTENIER | WARREN | RABENBERG | DAVID J |
| POST | CYNDI K | RADDEN | PATRICIA G |
| POTTENGER | JIMMIE R | RADKE | GORDON |
| POTTER | KENT W | RADOVICH | DOROTHY R |
| POTTER | EVELYN M | RAE | RAYMOND |
| POTTS | DENNIS | RAE | KEITH |
| POWELL | SCOTT | RAFFERTY | MARTHA SUE |
| POWELL | MYRA C | RAINES | STAN D |
| POWELL | MARLIN E | RAINEY | JOHN |
| POWER | THOMAS R | RAMBUR | MICHAEL G |
| POWERS | DAVID K | RAMSEIER | FREDERIC N |
| POYNOR | PAT | RANDALL | ARCHIE L |
| POZZI | HENRY J | RANG | RANDY D |
| PRAIRIE VIEW BIBLE CHURCH | | RASMUSSEN | EDWIN C |
| PRANSKY | ELIOT | RATTLESNAKE DUCK CLUB | |
| PREMIER BULDING & DESIGN | | RAUCH | KENNETH R |
| PRESCOTT | JAMES A | RAUSCH | KEITH |
| PRESS | RON W | RAWHOUSER | BOB W |
| PRICE | BARRY L | RAWLINS | MIKE D |
| PRICE | PERRY V | RAY | BRIAN |
| PRINTER | TIMOTHY T | RAY | JERRY T |
| PROCHASKA | ALBERT | RAY | SHIRLEY J |
| PROCIV | MARK R | RAY | DIRK K |
| PROFERA | ROBERT C | RAY | JENNIFER E |
| PROJECT LITTLE LEAGUE | | RAY | MICHAEL E |
| PROJECT MERCANTILE | | RAY | DONALD R |
| PROPP | LARRY | RAY & COMPANY REALTORS | |
| PROPP | TRAVIS | RAYBORNE | RODNEY W |
| PROPP | RANDY Z | READY | BRUCE |
| PROPP | GARY L | REAL ESTATE TRANSACTION | |
| PROPP | ALLEN C | REAMY | WALTER L |
| PROULX | ELVA | REDDING | BOB |
| PRYOR BAPTIST CHURCH | | REDFIELD | JONATHON K |
| PRYOR CREEK BAR | | REDINGER | LANCE L |
| PRYOR CREEK GOLF | | REDMAN | DARRYL T |
| PUGRUD | JOHN R | REED | TONY L |
| PULLIAM | MICHAEL | REED | PATRICIA |
| PULST | DARRELL A | REEDER | CRAIG E |
| PULVER | STANLEY D | REESER | CHARLES L |
| PURVIS | LAWRENCE W | REHARD | DAN E |
| PUTNAM | WALT | REHM | ROBERT M |
| PYETTE | VICKI D | REHRIG | DENNIS |
| QUALITY KITCHENS | | REICHENBACH | VICTOR |
| QUALLS | MICHAEL S | REICHERT | TED J |
| QUANBECK | ELMER | REICHERT | TED |
| QUANBECK | DAN E | REICHERT | GENE |
| QUIGLEY | MARJORIE | REICHERT | RANDY F |
| QUILICO | BERNIE | REIFLE | GEORGE I |
| QUINLEY | ROSEMARY | REILAND | TED G |

| Last Name | First Name | Last Name | First Name |
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| REIN | ALLEN D | RICHARDSON | JOHN N |
| REINHARDT | JOYCE M | RICHARDSON | DR LEE |
| REINHARDT | WILMER | RICHARDSON | CORY N |
| REINHARDT | KEN | RICKMAN | JASON L |
| REINHARDT | JAMES M | RIDDLE | LES L |
| REINHARDT | ROBERT J | RIDER | LORRAINE |
| REINKE | ANN L | RIEMAN | WILLARD |
| REINSCHMIDT | STEVEN S | RIGHTMIER | THOMAS R |
| REISDORFF | JOHN H | RIGNEY | JOHN M |
| REISER | FRANCIS J | RILEY | FLORENCE |
| REITER | DENNIS | RILEY | EVA M |
| REITER | RANDY L | RILEY | TOM E |
| REITER | ROBERT L | RINDAHL | JAMES |
| REITER | K MINK | RINDAL | LE ROY |
| REITER | PAT | RINDAL | ANGUS R |
| REITER | HERMAN | RINDERKNECHT | DANIEL W |
| REITER | EUGENE | RIPLEY | CRAIG |
| REITER | MICHELE B | RIPLEY | J MICHAEL |
| REITER | MICHAEL | RIPLEY | BUTCH D |
| REITER | WILLIAM E | RISSE | BRIAN K |
| REKDAL | SHANE M | RITTAL | ANN J |
| REMME | BRANDI L | RITZ | NICK C |
| REMMICK | SHIRLEY | RITZ | EDDIE D |
| RENNICH | LAWRENCE | RITZ | DAVID |
| RENNIE | DAVID G | RIVERA | CHERYL |
| RENO | RALPH A | RM BUILDERS INC | |
| RENO | JOSH J | ROACH | BRENT E |
| RESCH | LARRY | ROAN | JOHN |
| RESER | LOLA M | ROBBIE | SCOTT W |
| REST | ANDREW M | ROBBINS | RICHARD A |
| RESTAD | JUDY M | ROBERTS | PERRY |
| RETHMAN | VIC | ROBERTS | BRADLEY M |
| REXFORD | TRACY A | ROBERTS | ART |
| REYER | JAMES | ROBERTS | GERRY |
| REYNARD | WILLIAM K | ROBERTS | FRANCES |
| REYNOLDS | KEITH | ROBERTSON | KEN |
| REYNOLDS | ZANDRA R | ROBERTSON | DAVID R |
| REYNOLDS | MARTIN G | ROBERTUS | HENRY J |
| REYNOLDS | LEE | ROBERTUS | RAYMOND |
| REYNOLDS | JERRY T | ROBEY | GREG |
| REYNOLDS | WENDY A | ROBINETTE | COLLEEN F |
| RHOADES | N CLYDE | ROBINSON | WHITNEY S |
| RHOADS | LAWRENCE L | ROBINSON | BARBARA K |
| RHODES | RALPH E | ROBINSON | RANDALL |
| RHODES | DON L | ROBINSON | MARTIN M |
| RICE | PAUL C | ROBINSON | FRED |
| RICE | DOUG | ROBISON | RANDALL |
| RICE | SHARI A | ROBISON | GARY D |
| RICE | LAURIE | ROBISON | DWAYNE |
| RICHARD | LARRY J | ROBSON | LARRY |
| RICHARDS | WALTER D | ROCK | EMMALINE |

| Last Name | First Name | Last Name | First Name |
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| ROCKY MOUNTAIN AIR & | | RUDIO | GERALD W |
| RODEN | DON J | RUEGAMER | BONNIE LUE |
| RODGERS | JANET G | RUEGAMER | WILLIAM H |
| RODIER | M W | RUENHALL | LOUISE |
| RODRIGUEZ | MICHAEL | RUESCH | DONALD A |
| RODVOLD | GERALD S | RUFF | WILHELM R |
| ROE | REX | RUFF | KATHLEEN |
| ROGERS | GODFREY H | RUFF | TERRY L |
| ROGERS | DON | RUFF | SCOTT R |
| ROGERS | LEON N | RUFF | JOHN R |
| ROGERS | MICHAEL S | RUHD | BRUCE E |
| ROGERS | E F | RUHL | DAVID W |
| ROGERS | DIANE | RUHR | DANIELLE R |
| ROGERS | JON W | RUKSTAD | HARRY M |
| ROLANDSON | DEAN A | RULAND | JAMES R |
| ROLF | FREDA L | RUNESTAD | MARJORIE J |
| ROLL | LEON | RUPPRECHT | MARK L |
| ROLL | CLIFF J | RUSH | BILL |
| ROLL | RONNA M | RUSSELL | GREG |
| ROLLAND | EVELYN | RUSSELL | BILL |
| ROLLER | ALAN | RUSSELL | RICK |
| ROLLER | ED J | RUSSELL | JOSEPH W |
| ROLLMAN | JOHN | RUST | ROBERT W |
| ROME | GARY | RUSTAD | G TODD |
| ROMINE | LARRY J AND | RUTH | CLIFTON C |
| RONCELLI | JOE S | RUTH | MICHAEL D |
| RONDEAU | TERESA M | RUTZ | RODNEY L |
| ROODS | DARLYNE | RYAN | ROBERT M |
| ROSAGER | KRIS | RYE | JIM |
| ROSEKELLY | RICK R | RYKOWSKI | DAVID E |
| ROSIN | DARREL | RYMER | CHARLES E |
| ROSMAN | STACEY L | SABAL | ROSA J |
| ROSS | GORDON B | SADDLEBACK RIDGE INC | |
| ROSS-CLARY | CARI J | SAGE | RUSSELL |
| ROSSELOTT | RYAN W | SALAZAR | LARRY W |
| ROSSI | MIKE | SALVESON | ALLEN A |
| ROSSOW | LARRY | SALVESON | RAYMOND J |
| ROST | JOHN T | SALYER | JAMES M |
| ROTH | JAKE D | SALZMAN | HAROLD |
| ROUANNE | JEREMIAH L | SAM | ROBERT S |
| ROUTH | REVE L | SAMPSON | TIMOTHY |
| ROUTSON | MARY E | SAMSON | RANDY |
| ROWLAND | DAVE | SAMSON | JAMES A |
| ROWLAND | FRANK | SAMSON | JANA R |
| ROWLETT | WILLIS | SANCHEZ | CLIFFORD |
| ROYAL | JERRIE A | SAND | LAWRENCE J |
| ROYCE | DAVID W | SANDBAK | ALLEN |
| RRS INC | | SANDERS | DARRELL W |
| RUBASH | MITCHELL G | SANDERS | ELWIN |
| RUDE | R JOSEPH | SANNER | RAY |
| RUDIO | RUTH | SANNES | RONALD M |

| Last Name | First Name | Last Name | First Name |
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| SANNON | JACK | SCHLEINING | JIM H |
| SANNON JACK TRADER | | SCHLEINING | GORDON |
| SARKELA | CHARLES P | SCHLEPP | DOUGLAS L |
| SAUER | TIMOTHY M | SCHLOSSER | CURTISS L |
| SAUTER | RICHARD D | SCHLUND | RICHARD D |
| SAUTER | VIOLA | SCHMALZ | DAVID W |
| SAVAGE | ORAN L | SCHMIDT | GLENN R |
| SAWATZKY | GERHARD | SCHMIDT | LLOYD E |
| SCAMMON | ERIC M | SCHMIDT | GARY L |
| SCARLETT | ED A | SCHMIDT | DICK |
| SCHAAK | WILLIAM D | SCHMIDT | CLARK E |
| SCHAAK | LARRY | SCHMIEDING | MERRILL L |
| SCHAAP | THOMAS L | SCHMIT | DAVID A |
| SCHACHT | KENT A | SCHMITT | VERNARD T |
| SCHAEFBAUER | BARBARA A | SCHNEIDER | HAROLD E |
| SCHAEFER | DAVID | SCHNEIDER | GARY |
| SCHAFER | TOM L | SCHNEIDER | GENE |
| SCHAFF | CHRIS A | SCHNEIDER | JOHN D |
| SCHAFF | WARREN L | SCHNEIDT | DANE D |
| SCHAGUNN | JACK S | SCHOCK | THOMAS J |
| SCHALLA | ROBERT A | SCHOTT | ALLEN R |
| SCHALLER | GEORGE T | SCHOUVILLER | LEROY |
| SCHANCK | LANDRA L | SCHRAUDNER | SHEILA |
| SCHANTZ | GARY E | SCHREDER | STEVEN F |
| SCHARA | DIANA L | SCHREINER | BARBARA J |
| SCHARNHORST | JOE W | SCHROEDER | E J |
| SCHAUER CONSTRUCTION | | SCHROEDER & MICHAEL INC | |
| SCHEELER | LYNN R | SCHUBERT | GRETCHEN V |
| SCHEELER | LEON | SCHULTZ | TIM |
| SCHEETZ | TERRY L | SCHULTZ | RICHARD |
| SCHEIDLER | ROGER | SCHULTZ | WILLIAM A |
| SCHEIE CONST INC | | SCHULZ | KURT W |
| SCHEIHING | DANIEL P | SCHULZE | PAUL |
| SCHEINO | ELIZABETH J | SCHWAB | ROBERT |
| SHELL | LLOYD | SCHWAB | RICHARD L |
| SHELL | JIM R | SCHWARTZ | CLAY W |
| SHELL | CLIFFORD | SCHWARZ | ROGER A |
| SCHELM | SCOTT B | SCHWARZINGER | WILHELM |
| SCHERR | ROBERT D | SCHWARZINGER | CORINA R |
| SCHERRY | RONALD | SCHWEIGER | CHARLES E |
| SCHessler | ROB K | SCHWEIGERT | BLAINE |
| SCHEUNEMANN | PAULA J | SCHWEIGERT | MARK S |
| SCHIBILD | EDWARD W | SCHWEIGERT | CHARLES |
| SCHILD | WILLIE | SCHWEIGERT | JOHN K |
| SCHIFF | ROBERT J | SCHWEIGERT | DAROLD B |
| SCHILLING | BILL | SCHWEITZER | JULIE M |
| SCHINDLER | DANIEL G | SCHWEND | TANDEEN J |
| SCHINNOW | JON M | SCHWINDT | DOUG |
| SCHLAEPPI | NEIL G | SCOLLARD | ROBERT A |
| SCHLEGELMILCH | DON | SCOLLARD | CURT J |
| SCHLEINING | ANNA V | SCOTT | TOMMY E |

| Last Name | First Name | Last Name | First Name |
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| SCOTT | DARRYL E | SHEPPARD | GERALD M |
| SCOTT | JACKIE | SHERBEYN | ROBERT L |
| SCOTT | MARIAN V | SHERMAN | FLORENCE R |
| SCOTT | GARY C | SHERMAN | EUGENE C |
| SCSHOTT | DALE R | SHERMAN | JOHN L |
| SEADER | ROBERT W | SHERMAN | DONALD H |
| SEADER | DON D | SHERMAN | LESTER J |
| SEAHOLM | EARL | SHERMAN | JON |
| SEALEY | PAUL J | SHERMAN | ROBIN |
| SEAMANS | ROGER L | SHERMAN | TWYLA |
| SECHLER | THOMAS E | SHERRODD | W C |
| SEDER | RICHARD | SHERRODD | GARY E |
| SEDER | DAVID L | SHERRODD | T E |
| SEDER | NORMA K | SHERRODD | LARRY |
| SEDER | RON L | SHERSETH | BRAD |
| SEE | KELLY G | SHERWOOD | RICHARD E |
| SEED | TAMISE C | SHILHANEK | TIM W |
| SEGHIERI | GARY M | SHIMEK | DAVID R |
| SEIBERT | BRIAN D | SHINNERS | STEVEN R |
| SEIDEL | TIM J | SHIVER | JACK |
| SEIFFERT | ERROL R | SHOAF | JOHN W |
| SEITZ | JAMES | SHOCK | STERLING |
| SELLARS | ALLEN H | SHOEN | RONALD K |
| SENN | SHARON R | SHORES | LYLE |
| SENN | DWAYNE H | SHRADER | RAYMOND W |
| SERFAZO | ERNEST | SHUCK | DAVE A |
| SERFAZO | KULLEN A | SHUMAKER | JERRY D |
| SEVENTH DAY ADVENTIST CHURCH | | SHUMATE | JOSH D |
| SEXTON | DENNIS L | SIAN | STEVEN P |
| SEXTON | GEORGE | SIAN | HERMAN |
| SEYMANSKI | RUSSELL L | SIEGFRIED | ANNAMAE M |
| SEYMANSKI | JOE | SIELER | THOMAS P |
| SEYMOUR | CLIFFORD C | SIELINSKY | WILLIAM |
| SHAFFER | DALE | SIEMERS | CLYDE F |
| SHAFFER | JENNIFER | SIEMERS | LARRY L |
| SHANAHAN | ROBERT J | SIEMERS | DANNY |
| SHANDY | JACK E | SIEMSEN | IRVIN |
| SHANNON | DAVE W | SIEPS | DAVID J |
| SHARBONO | DENNIS E | SIERRA | RAY W |
| SHAULES | DAVE | SIEWERT | GEORGE A |
| SHAULES | RICHARD L | SIEWERT | ARTHUR |
| SHAW | HAL R | SIEWERT | BENNIE E |
| SHAW | DOYLE | SIEWERT RANCH | |
| SHAY | MELVIN D | SIKEL | GERALD |
| SHAY | GERALD | SIMAC | KERRY O |
| SHAY | ALTA M | SIMON | HOMER |
| SHAY | LOYD E | SIMON | FRANK J |
| SHAY | NORMAN K | SIMONICH | PETER J |
| SHELHAMER | ROBERT S | SIMONS | ROBERT D |
| SHEPARD | SHIRLEE D | SIMPLT SOIL BUILDERS | |
| SHEPHERD CEMETERY | | SIMPSON | DOLORES C |

| Last Name | First Name | Last Name | First Name |
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| SIMPSON | PHILLIP M | SMITH | VERDIE E |
| SIMPSON | DAVE W | SMITH | CHARLES H |
| SIMPSON | WESLEY P | SMITH | WARREN |
| SINDELAR | ROBERT S | SMITH | LARRY D |
| SINDELAR | JAMES H | SMITH | DONALD L |
| SINDELAR | JOEL J | SMITH | CHRIS C |
| SIPE | ALLAN D | SMITH | SCOTT A |
| SIRING | RONALD J | SMITH | GREG |
| SIROKY | CARL R | SMITH | RAYMOND T |
| SITZMAN | WALTER L | SMITH | CONNIE L |
| SITZMAN | BEVERLY A | SMITH | BRENT R |
| SIZEMORE | TRENT | SMITH | BARBARA L |
| SJOLSETH | DEAN A | SMITH | JAMES L |
| SJOSTROM | MELVIN J | SMITH | DAVID C |
| SKAER | RON W | SMITH | MAURICE |
| SKAGGS | MICHAEL W | SMITH | JAMES D |
| SKAGGS | GRADY | SMITH | LINDA SUE |
| SKAGGS | JOSEPH L | SMITH | RANDOLPH |
| SKILLMAN | BILL | SMITH | SOPHIE |
| SKINNER | DERRICK D | SMITH | BRUCE W |
| SKJERET | LOREN B | SMITH | KEATH L |
| SKOGAS | BRAD S | SMITH | WANDA M |
| SKORICK | DELVIN | SMITH | VERNON G |
| SKRAMSTED | JAMES E | SNELLING | RONALD |
| SKRIBSTAD | JOSEPHINE C | SNOW | BOB G |
| SLEAFORD | ALAN | SNYDER | DEBORAH A |
| SLIND | TROY R | SNYDER | RUBY M |
| SLOAN | DANIEL L | SODERBERG | PAULINE I |
| SMARSH | KELLY W | SOENS | SHIRLEY J |
| SMART | HARRY T | SOFT TOUCH DESIGNS INC | |
| SMELSER | JUDY A | SOLBERG | DAVID L |
| SMELTZER | EVERETT J | SOLBERG | BILL A |
| SMILLIE | JOHN D | SOLEM | LYNN C |
| SMITH | KEVIN M | SOLIE | MARK |
| SMITH | MARGUERITE | SONGER | PAUL |
| SMITH | RAYMOND T | SORENSEN | JOHN L |
| SMITH | BARRY W | SORENSEN | PERRY O |
| SMITH | PAUL R | SORGE | DOUG |
| SMITH | DUANE D | SOUTHERN AG RESEARCH CENTER | |
| SMITH | GERALD A | SOUTHWORTH | DAVID D |
| SMITH | DAVID R | SOUTHWORTH | JOE |
| SMITH | JACKSON M | SOUTHWORTH | JAMES O |
| SMITH | RICHARD L | SOUZA | MAC |
| SMITH | JIM J | SOWERS | SHELBY D |
| SMITH | RANDY R | SPAH | KELLY |
| SMITH | MARJORIE G | SPAROVIC | JOHNNY L |
| SMITH | DEBRA | SPATZIERATH | BETTY JEAN |
| SMITH | PAUL L | SPAULDING | A DALE |
| SMITH | AARON G | SPEAR | CAREY E |
| SMITH | BERNADETTE C | SPEARS | STEVE E |

| Last Name | First Name | Last Name | First Name |
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| SPECIALIZED CONSTRUCTION INC. | | STEINER | DELBERT |
| SPECK | LARRY P | STEINER | DARIN |
| SPEER | RICHARD A | STEINER | DOUGLAS M |
| SPEIDEL | GENE A | STEINER | EDWIN |
| SPENCE | KATHRYN A | STEINER | JEFF |
| SPENSLEY | JANET C | STEINMETZ | CAROL A |
| SPICKARD | D SCOTT | STEINMETZ | WADE |
| SPINI | MICHAEL E | STEINMETZ | P JAMES |
| SPITZER | JIM J | STELLOH | JEFFREY |
| SPITZER | CALVIN | STENE | EARL H |
| SPITZER | STEVE W | STENGER | WILLIAM T |
| SPOONER | ROBERT | STENGER | LEONARD |
| SPOONER | JIM | STENGER | ZANE P |
| SPOTTED BEAR | MAX | STENGLEIN | JOE C |
| SPRAGUE | PHILLIP M | STENULSON | GERALD W |
| SPRIGLER | THOMAS | STENULSON | G M |
| ST CYRIL & METHODIUS CHURCH | | STEPHENSON | STEVE J |
| STAHL | JACOB A | STEVENS | STAN K |
| STAHL | REUBEN P | STEVENS | STAN M |
| STAHL | RICHARD L | STEVENS | JEFF W |
| STAHL | WESLEY | STEVENS | DAVE |
| STAHL | RYAN D | STEVENS | DAN |
| STAHL | GLENN J | STEVENS | CAROLYN L |
| STALEY | HARRY R | STEVENSON | JAMES M |
| STALEY | JAMES | STEWART | MATT J |
| STANEK | GENE A | STEWART | BRAD |
| STANEK | DON | STEWART | L E |
| STANGER | JAY C | STEWART | JAY E |
| STANHOPE | CLYDE R | STEWART | KIRK D |
| STANISLAWEK | STAN | STEWART | RICH |
| STANISLAWEK | NICHOLAS | STIEF | GERALD R |
| STANLEY | MARTIN | STIEF | JAY R |
| STAPP | THOMAS L | STIER | PEGGY L |
| STARK | JIM P | STIFF | DIANNE T |
| STARK | JOHN A | STILES | CHARLES |
| STARKWEATHER | JON M | STILLWATER COUNTY | |
| STARNES | LARRY G | STOCK | LISA R |
| STATON | LARRY | STOCKMAN BANK | |
| STEADMAN | MARVIN A | STOICK | MARJORIE E |
| STEARNS | JACK L | STOLINSKI | GAYLE S |
| STEELE | ROBERT E | STOLTZ | ROBERT J |
| STEFANI | TONY A | STOLTZ | MARY M |
| STEFANIC | RICK | STOLZENBURG | KURT A |
| STEFANIK | MAXINE | STONE | WILLIAM F |
| STEFFANS | ROBERT G | STONE | JAKE |
| STEFFANS | ROBERT G | STONE | TRUBI J |
| STEFFES | MARK B | STONEHOCKER | DAVID C |
| STEIGER | ANDY P | STONER | T BENJ |
| STEIN | KIM | STORY | STEVEN |
| STEIN | PETER | STOTT | JAMES S |
| STEINDORF | DANIEL P | STOUT | SHERYL A |

| Last Name | First Name | Last Name | First Name |
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| STOVALL | P DOUG | SUTTON | ROBERT J |
| STOVALL | JAY | SWAIN | JAMES |
| STOWE | TROY L | SWAN | JOHN T |
| STOWE | EILEEN E | SWANDAL | SHANE A |
| STRAHAN | RONDA M | SWANTON | JAMES E |
| STRAND | DOUGLAS A | SWENGRAY DRILLING INC | |
| STRAND | MARVIN | SWICK | ROBERT G |
| STRANGE | MICHAEL I | SWITZER | STAN G |
| STRATFORD FARMS | | SWOOP | JOHN C |
| STRATTON | GERRY L | SYKES | DAVID J |
| STRATTON | DONALD G | SYNDERGAARD | STEVE J |
| STRAUCH | WILLIAM | SYNEK | MATT |
| STRAUCH | MELVIN D | T P TRANSPORTATION | |
| STRECK | ROBERT | TAAPKEN | SONIA M |
| STRECK | HERMAN G | TALKINGTON | LORI A |
| STREETER | VERN G | TALMARK | HENRIK L |
| STRICKLER | BARBARA J | TANGEL | RICHARD E |
| STRICKLER | TIMOTHY M | TAS ENTERPRISES | |
| STRIZICH | KORI | TAYLOR | GERALD E |
| STROBBE | RUBY | TAYLOR | LOUIS A |
| STROBEL | STEVE J | TAYLOR | DANIEL M |
| STROBEL | HAZEL | TAYLOR | MARILYN J |
| STROBEL | BRYAN K | TAYLOR | DEBRA E |
| STROMME | WARREN G | TAYLOR | GAYLE |
| STRONG | JUDY | TAYLOR | LYNNE |
| STRUCKMAN | LINDA D | TAYLOR | BOB S |
| STRUM | DAVID R | TAYLOR | R PHILLIP |
| STUDER | RALPH P | TAYLOR | CECIL R |
| STUNES | DONALD | TEBAY | KEVIN S |
| SUKO | JIMMIE M | TEDROW | VICTOR |
| SULLIVAN | ANDREW & | TEEGARDEN | THOMAS N |
| SULLIVAN | BRAD | TEEGARDEN | TRAVIS P |
| SULLIVAN | DEAN P | TEETERS | BRUCE R |
| SULSER | SIDNEY | TEETERS | WILLIAM |
| SUMMER | BRENT C | TEINI | HUGH |
| SUMMIT ELECTRIC INC | | TEMPERO | CLAIR |
| SUMP | ROBERT | TENBROOK | CLARIS E |
| SUND | RAYMOND L | TERPSTRA | ARTHUR |
| SUNDSTED | JODY S | TERRACIANO | MICHAEL R |
| SUNDSTROM | BLAINE P | TERRY | LAURALEE E |
| SUNLIGHT RANCH CO. | | TESDAL | MARTIN J |
| SUNSHINE LIMITED PARTNERSHP | | TETER | BONNIE I |
| SUPER | CHARLES M | TETZLAFF | STEVE |
| SUPER | GERALD E | THATCHER | JOHN |
| SUPERIOR BUILDERS LLP | | THATCHER | WES L |
| SURA | MIKE E | THAUT | EDWARD |
| SURALSKI | WILLIAM | THE BOARDWALK | |
| SURBER | DEANNA G | THE BRIARWOOD | |
| SUSOTT | BRIAN E | THE CIGARETTE STORE COPORATION | |
| SUSOTT | HARVEY L | THE MINNOW BUCKET | |
| SUTTON | JIMMY S | THE NET-WORKS INC | |

| Last Name | First Name | Last Name | First Name |
|-------------------|--------------|-------------------------------|-------------|
| THE PERFECT PLACE | | TOOLE | JAMES |
| THE RIVER'S EDGE | | TOPEL | RICHARD H |
| THELEN | TIMOTHY J | TORPY | DUANE J |
| THELEN OUTDOORS | | TOUR AMERICA | |
| THEURER | HARRY J | TOWLER | WILLIAM G |
| THEURER | EDWIN E | TOWNSEND | MURRAY C |
| THIELEN | JOHN F | TOWNSEND | BOB |
| THIRUD | MARK | TOWNSEND | WAYNE |
| THOM | JASON H | TRANKLE | HANS W |
| THOM | ANGELINE M | TRASK | MARK M |
| THOMAE | PAUL | TRAUTMAN | GREG A |
| THOMAE | PAUL C | TRAVER | LLOYD |
| THOMAS | LAWRENCE O | TREASURE STATE PLUMBING | |
| THOMAS | TONY L | TREASURE STATE TRANSPORTATION | |
| THOMAS | DAVID M | TRENK | MARLENE |
| THOMPSON | STEVEN C | TREUMANN | HANS |
| THOMPSON | CORI M | TRI PAC INVESTORS INC | |
| THOMPSON | BRENT D | TRI STATE RECYCLING INC | |
| THOMPSON | JUNE D | TRIGGS | PATSY D |
| THOMPSON | JEAN M | TRIMBO | GERALD H |
| THOMPSON | DALE B | TROMBETTA | ROBERT B |
| THOMPSON | BRUCE E | TROTTER | TRAVIS L |
| THOMPSON | BARRY R | TRUDEAU | LARRY |
| THOMPSON | MARLON | TRUELSON | HENRY K |
| THOMPSON | LAURIE E | TRUJILLO | VALERIE J |
| THOMSEN | ROGER | TRYAN | GORDON D |
| THOR | DAVID J | TSCHACHER | BART M |
| THORNBERG | JAMIE R | TUCKER | SAM L |
| THRONBURG | MIKE | TURLEY | AUSTIN A |
| THRONSON | STEVE J | TURNER | GREGG C |
| THULESEN | JERRY | TURNER | CLYDE S |
| THUM | SHEILA | TURNER | CHANNING R |
| THUROW | WILLIAM H | TURNER | JACKIE J |
| TIEFENTHALER | BILL M | TURNER | JAMES D |
| TILLER | WAYNE L | TURNER | KELLY R |
| TIMM | JANICE | URNSPLENTY | ROGER |
| TIMMERMAN | GERALD E | TUTINO | DARRIN |
| TIMMONS | C DANIEL | TWITCHELL | ORTIE |
| T-K FARMS LLC | | U S POST OFFICE | |
| TOAVS | JEFFREY | UECKER | ADEN J |
| TOAVS | WARREN V | UFFELMAN | HARRY LEROY |
| TOBIN | MAGDALEN | ULRICH | LANCE H |
| TOBLER | LESLIE G | ULSCHAK | ROBERT |
| TODD | JACK E | ULSCHAK | ERIC L |
| TODD | TOM | UNITED HARVEST INC | |
| TOEDTER | ROBERT J | UNKOVICH | ANTON J |
| TOLLEFSON | LINDA | UNRUH | GERRY A |
| TOLZIEN | MICHAEL J | UNTRAUER | LAURINE R |
| TOMBRINK | DICK J | URBACH | ROBERT L |
| TOMES | JAMES EUGENE | URLACHER | SCOTT |
| TOOKE | SCOT J | USHER | BARRY M |

| Last Name | First Name | Last Name | First Name |
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| V-1 PROPANE | | WALDHAUSER | ED |
| VAIRA | JACK D | WALDHAUSER | BRAD |
| VALDEZ | JESSE | WALDO | JAMES E |
| VAN VRANKEN | TIM | WALEN | REID |
| VAN WAGNER | ROGER B | WALES | ORVAL A |
| VANCLEEVE | RICK L | WALICSKI | EDWARD W |
| VANDEGRIFT | GLEN A | WALKER | BRUCE R |
| VANDENBRINK | RON | WALKER | JAMES D |
| VANDERJAGT | DAN | WALKKI | JERRY P |
| VANDERLOOS | WILLIAM E | WALL | HENRY L |
| VANDERPAN | GORDON | WALL | NORM |
| VANDERSLOOT | DONA E | WALLACE | JOE L |
| VANDERSNICK | DEAN T | WALLILA | DALE R |
| VARELA | WILLIAM E | WALLILA | CARL |
| VAUGHAN | DAN B | WALLILA | ROBERT |
| VAUGHN | DAVID J | WALLILA | MARGUERITE P |
| VDE VRIES | RONDA R | WALLIS | LAMONT |
| VECHES | TIMOTHY | WALSH | LAWRENCE J |
| VEEN | ALLEN M | WALTER | LARRY A |
| VEGGE | DONALD | WALTER | JODY L |
| VELENCHENKO | GUST | WALTER | TRAVIS L |
| VERALDI | DONNA | WALTER | WAYNE D |
| VERHASSELT | RAY J | WALTER | RONALD E |
| VERLAND | THOMAS | WALTER | PAUL |
| VERMANDEL | ERNEST | WALTER | KIM L |
| VERMANDEL | BILLIE | WALTER | DENNIS R |
| VERMANDEL RANCH INC | | WALTERS | LEONARD |
| VERMILLION | JACKIE | WALTNER | RICHARD H |
| VERMILLION | LISA A | WALTON | SCOTT K |
| VERSACE | ENRICO J | WANDLER | JACK V |
| VETERANS OF FOREIGN WARS | | WANG | LINDSAY A |
| VICHOREK | CHERYL | WARD | DURAND |
| VICKERY | ROBERT | WARD | MARJORIE |
| VIGUS | KEIP | WARNER | ROY D |
| VILLA | DAVID M | WARREN | MARVIN |
| VINSON | MAVIS | WATERLAND | DOREEN K |
| VOGEL | DWAYNE | WATERMAN | JUDY |
| VOLD | STEVEN A | WATROUS | FRANK E |
| VON KLEECK | R LEWIS | WATSON | C A |
| VULETICH | MARK | WATSON | DAISY L |
| WADDELL | AUDREY | WATSON | LARRY |
| WAGENMAN | GEORGIA L | WATSON | WANDA R |
| WAGGONER | COLLEEN R | WATTLES | TERRY |
| WAGNER | PAUL J | WEAST | BARBARA A |
| WAGNER | DAVID E | WEATHERWAX | JAMES S |
| WAGNER | DENNIS | WEBB | SAM F |
| WAGNER | JUSTIN G | WEBB | STEVE B |
| WAGNER | GERNET W | WEBB | KATHERINE MARY |
| WAGNER | JULIE | WEBBER | LLOYD J |
| WAGSTAFF | RAYMOND E | WEBER | KENNETH H |
| WAIDE | RICHARD H | WEBER | PATRICK G |

| Last Name | First Name | Last Name | First Name |
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| WEBER | GARY L | WHEATLEY | MARK |
| WEBSTER | HENRY D | WHEELDON | JAMES |
| WEBSTER WATER USERS ASSOC | | WHEELER | JERRY A |
| WEEDEN | WILLIAM W | WHEELER | FRANCIS |
| WEGNER | GERALD C | WHITCANACK | DARRYL J |
| WEGNER | EVELYN R | WHITE | CURT J |
| WEGNER | DUWAYNE | WHITE | PATRICK P |
| WEGNER | RICHARD E | WHITE | CHRISTOPHER A |
| WEICHEL | THOMAS R | WHITE | JUDY G |
| WEIDINGER | EDWARD | WHITE | CHARLIE |
| WEIDLER | MIKE G | WHITE | AMANDA E |
| WEIDNER | ROLAND K | WHITE | THOMAS R |
| WEIGAND | GEORGE T | WHITE | BRUCE |
| WEIGEL | ERNEST | WHITE | MARK R |
| WEIGUM | ROLLAND R | WHITELEY | S CRAIGE |
| WEINZETL | AGNES R | WHITMAN | BRENDA J |
| WEINZETL | DONALD M | WHITMORE | DENNIS L |
| WEIS | BILL | WHITTINGTON | MARY C |
| WEISGERBER | DONALD A | WHITTINGTON | MIKE |
| WEISS | ARTHUR J | WIBERG | CLARENCE |
| WEISS | EDWARD J | WICKENS | LEAR A |
| WELBORN | TERRY | WICKER | DONALD A |
| WELCH | LORN | WICKHAM | STEVEN E |
| WELCH | DOUGLAS F | WICKS | CRAIG W |
| WELCH | JOHN D | WIDDICOMBE | ROBERT D |
| WELCH | PATRICK G | WIDNER | JIM L |
| WELCH | LINDA L | WIECHMAN | L R |
| WELCH | JOHN D | WIELAND | JOHN H |
| WELDON | JEFFREY A | WIERZBOWSKI | TOM |
| WELHAVEN | LEIF E | WIGGINS | JOE L |
| WELK | GERTRUDE | WILCOX | RICHARD C |
| WELLES | SCOTT F | WILCOX | STACIE A |
| WELLS | MARK A | WILD ROSE FLORALS | |
| WELLS BUILT HOMES INC | | WILDIN | DANIEL O |
| WELLS GARDEN ESTATES | | WILEY | RICHARD A |
| WELSH | LORAIN M | WILKERSON | BRUCE E |
| WELTER | LAVERNA C | WILKINS | JAMES |
| WENDELN | KATHY L | WILLEMS | J DOUG |
| WENDTE | RICHARD D | WILLETT | TRACY L |
| WERNER | MITCH | WILLIAMS | JULIE A |
| WESCHENFELDER | HENRY | WILLIAMS | MARY M |
| WEST | WILLARD L | WILLIAMS | DELBERT N |
| WEST | NADJA M | WILLIAMS | RON L |
| WEST | JERRY B | WILLIAMS | GEORGE |
| WESTATE MACHINE COMPANY | | WILLIAMS | WILLIE A |
| WESTERBUR | CECIL | WILLIAMS | THELMA C |
| WESTERMAN | JAMES | WILLIAMS | DANIEL E |
| WESTERN PLAINS MACHINERY CO | | WILLIAMS | MIKE |
| WETHERINGTON | CHARLES E | WILLIAMS | KAY |
| WETZEL | TERRY C | WILLIAMSON | MARK |
| WHALEY | DAVE | WILLIS | RAY |

| Last Name | First Name | Last Name | First Name |
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| WILM | KEVIN D | WORM | HAROLD |
| WILMOT | TIMOTHY B | WRIGHT | JOHN P |
| WILSON | FRED A | WRIGHT | JACK |
| WILSON | WADE A | WRIGHT | ROLAND J |
| WILSON | MARK D | WRIGHT | ROBERT E |
| WILSON | DON | WRIGHT | JOHN CLAYTON |
| WILSON | TODD C | WRONA | DARRYL |
| WILSON | DOUGLAS J | WROOT | VANCE W |
| WILSON | RONALD L | WRZESINSKI | CRAIG |
| WILSON | J TODD | WUNDERWALD | RANDALL S |
| WILSON | BARBARA H | WYANT | LARRY |
| WILSON | JOHN W | WYMAN | LILLIAN E |
| WILSON | MAURICE G | WYMAN | LARRY J |
| WILSON | STEVE L | Y V E C | |
| WILSON | LOUISE | YAGER | HENRY |
| WINGER | ROBERT K | YAMAMOTO | NILS |
| WIRKMAN | JERALD W | YANCHISIN | MYRAL |
| WIRTH | JEFF R | YARLOTT | DAVID F |
| WISE | JAMES R | YATCH | CHAD R |
| WITTENBERG | TIA A | YEGEN | PETER |
| WITTMAN | SHIRLEY | YEGEN | PETER |
| WITTMAN | HAROLD | YELLOWSTONE VALLEY PARTS | |
| WITTMAN | JON | YERGER | RUSS D |
| WITTMER | DANIEL A | YERGER | GARY |
| WITTMER | WILLIAM | YODER | JOHN ARLEN |
| WITZEL | JOHN A | YORK | SCOTT K |
| WOIRHAYE | FRANK J | YOST | DONALD C |
| WOLD | J O | YOST | GARY D |
| WOLD | JOHN | YOST | EUGENE J |
| WOLF | CARL | YOUDE | RON E |
| WOLF | SHELDON | YOUNG | STEVE S |
| WOLF SHELDON CONSTRUCTION | | YOUNG | DANIEL R |
| WOLFF | BETTE M | YOUNG | JUSTIN |
| WOLFF | LANE A | YOUNG | DOUGLAS |
| WOLFF | H K | YOUNG | MINNIE B |
| WOLLENBURG | STEVEN | YURIAN | DENNIS S |
| WOLSKE | ROBERT E | ZACCAGNINI | GARY |
| WOLVERTON | SCOTT R | ZAHLLER | ALAN |
| WONDER | BEVERLY J | ZAHM | ROY W |
| WOOD | GREG L | ZAHM | ROY |
| WOOD | ERVIN | ZAINO | BEN J |
| WOODARD | JEFF D | ZAPATA | VINCENT B |
| WOODROCK | JOAN M | ZAPP | JAMES F |
| WOODROCK | MAE W | ZARNDT | CARL |
| WOOG | JIM | ZASTROW | JEFF M |
| WOOLLEY | ROSS | ZEILER | RONALD |
| WOOLSEY | WILLIAM R | ZEILER | WILMA J |
| WOOLSEY | ALBERT F | ZEILER INC | |
| WORDEN | JEFF | ZEINSTRA | AL W |
| WORDEN MOTORS | | ZEITNER | DOUG W |
| WORDEN OPEN BIBLE CHURCH | | ZEMPLSKA | MILO J |

| Last Name | First Name | Last Name | First Name |
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| ZENT | CAMILLE A | ZIER | DANIEL B |
| ZENTNER | LEO | ZIMMER | PAT L |
| ZENTNER RANCH LP | | ZIMMERMAN | JOHN C |
| ZENTZ LUMBER COMPANY | | ZIMMERMAN FAMILY LTD | |
| ZICKEFOOSE | TEAL L | ZOLLINGER | TERRY J |
| ZICKEFOOSE | VERNON R | ZUBACH | KARI L |
| ZIEBARTH | SILVER A | ZUCK | LESLIE H |
| ZIEGLER | VIOLA M | ZUCK | MICHAEL J |
| ZIEGLER | JAMES A | ZUCK | JOHN G |
| ZIELSDORF | MARVIN T | ZWEMKE | LEO |
| | | | |

Montana Environmental Information Center Postcard

A second set of postcards opposing the HGS was distributed by the Montana Environmental Information Center (MEIC). This postcard reads (*italics added*):

Dear Ms. Johnson:

I'm writing to express my concerns about the proposed Highwood Generating Project and the draft EIS. As designed, the project would needlessly threaten public health and environmental quality by emitting thousands of tons of regulated air pollutants each year, and millions of tons of global warming pollution. The draft EIS failed to independently assess the real need for this project and the economic risk of becoming overly dependent on a single fossil-fuel based resource. The EIS also needs to properly analyze cleaner alternatives working in combination.

Four comments were extracted from this postcard and divided among the comment categories shown in Table L-3 below. Because their numbers could be accommodated, signatories to this postcard who also hand-wrote in their own comments on the postcard are included in Tables L-3 and L-4 below. Table L-2 below lists the names of those who sent the MEIC postcard to DEQ.

Table L-2. Senders of the MEIC Postcard Expressing Concern About the HGS and DEIS

| Last Name (s) | First Name(s) | Last Name (s) | First Name(s) |
|-----------------|---------------------|---------------|---------------|
| ADAMS | JANE | BOETTCHER | ROBERT |
| ALBERTSON | JOYCE | BORT MD | ROBERT F |
| ALLAIRE | F JOHN & HELENE | BORTON | CHRISTOPHER |
| ANGELL | JOE | BOWERS | JERRY C |
| ARENSBERG | VIRGINIA | BRACKETT | GLENN K |
| ARMSTRONG | APRIL | BRANDBORG | BEKI G |
| ARNOLD | JANE K | BROWDER | SHARON |
| BAIZ JR | THOMAS A | BROWN | CLAUDIA S |
| BALDWIN | SCHERRY | BROWN | RAYMOND D |
| BARNES | GLENDA | BROWN | GARY |
| BARNETT | JIM | BROWN | SALLY |
| BARNGROVER | JAMES | BUCKLEY | MURIEL |
| BARRETT | HEIDI | BUCSIS | RICHARD |
| BAXTER | BRUCE | BURGESS | HENRY |
| BECK | BOB | BURMEISTER | MARION R |
| BECKER | MICHAEL & STEPHANIE | BUSEY | SARA |
| BENHAM | JANICE R | BUTCHER | MARGARET ANN |
| BENNETT | DONNA C | BYRNE | KERRIE |
| BERGSTEIN | DIANE | BYRON | TIMOTHY |
| BERTELSEN-JAMES | JAN | CADY | KATIE |
| BIANCHI | DON | CAMPBELL | DOUGLAS |
| BISHARAT | MARTHA | CAMPEAU | JACKLYN |
| BLAKE | JO ANNE | CAPLETT | JENNA |
| BLANDING | TERESE & KEITH | CASE | LORRAINE S |
| BLOOD | W A | CASICK | MATT |
| BLOOM | ELIZABETH | CASLER-FAGRE | ANN |

| Last Name (s) | First Name(s) | Last Name (s) | First Name(s) |
|---------------|------------------|---------------------|------------------------|
| CAUGHLAN | CHARLES | FOOLERY | TOM |
| CENTER | DAVID | FOREHAND | DICK |
| CHAMBERS | NONA | FOSTER WEST | JACKIE & MICHAEL |
| CHESSIN | M | FOULKE | TERESE |
| CHRISTENSEN | L | FOX | WENDY C |
| CLAWSON II | WILLIAM E | FREDLUND | DALE |
| CLAYPOOL | DUANE | FREESTONE | ANDREW |
| CLEMENT | MERYLE | FREISTADT | ROBERT T |
| COLLINS | CAROL | FRYER | JOHN W |
| COLVIN | SUSAN C | G | THOMAS G |
| CONRAD | TERRY & GERMAINE | GARRITY | JOHN PHILLIP |
| COOK | MARGIE | GASKIN | LE ROY |
| COSNER | MARK | GESUALE | PETER M |
| COULTHARD | LORNA | GILBERTSON | NANETTE |
| CROSS | LOUISE | GILMAN | GINNY |
| CROWLEY | LOU ANN | GLAIN | DON |
| DAGENAIS | PHYLLIS | GLINNWATER | TREASA |
| DAVENPORT | TERRY D | GNIADEK | STEVE |
| DAVIS | AMY F | GOODMAN | JANA D |
| DAVIS | CRAIG T | GOULD | WILLIAM |
| DECKER | EILEEN S | GRAFF | JON |
| DEVENY | CHRISTINE | GREEN | MERLE |
| DEWEESE | GENEVIEVE | GREENE | JAMES D |
| DIEMER | EUGENE | GREGOVICH | GAYLE |
| DONOVAN | DANIEL | GREYMORNING | HELEN |
| DREYER | CLARICE | GRUDEN | FRANK R & DOROTHY M |
| DUNN | ANDREA | GUTKOSKI | JOE |
| ECKLUND | RICHARD & ALMA | HAIGHT | ROBERT D |
| EDWARDS | PAUL F | HAINSWORTH | PAMELA |
| EGGEN | ERIC | HALLER | LAURIE KAYE |
| ELLINGSEN | VALLEY | HAMERSLEY / HARKINS | DENISE & JAMES |
| EMMER | KEVIN | HAMILTON | MARY B |
| ENGELLANT | GREGORY | HAMMER | KEITH |
| ENGELSON | NORMA | HANSEN | KATHLEEN |
| ERICKSON | CHARLENE | HANSEN MD | JAMES G |
| ERICKSON | RON & NANCY | HARDEY | BECKY |
| ESTAR | MARIE B | HARDING | GRACE & WARREN |
| ETCHART | PATRICIA S | HARDING | THOMAS |
| EVERINGHAM | CATHERINE B | HARDY | CHARLES E |
| FALSTAD | BEVERLY | HARKINS | LESTER L |
| FARMER | PAM | HARMATA | ALAN |
| FAULEY | RAE MARIE | HARPER | SHANNON |
| FERENSTEIN | JENNIFER | HARRIS | DON |
| FICHTNER | SHEILA | HASH | BONNIE |
| FIELD | CHRIS | HASTINGS | TERESA I |
| FISHER | R G | HAUGE | BARBARA B |
| FLEISCHER MD | LISA | HAUMBERGER | HANS |
| FONTANA | JOAN R | HAY | JOHN |

| Last Name (s) | First Name(s) | Last Name (s) | First Name(s) |
|----------------|------------------|------------------|---------------|
| HEFFERN | ROY | KORFANTA | EDNA M |
| HELPS | JEAN | KROOK | MARVIN E |
| HENTGES | ROBERT | KULISH | CAROL |
| HERBIG | LOIS | KULSENG-HANSEN | MELISA LEE |
| HICKEY | CURTIS | LABUFF | LORNA |
| HILL-HART | J | LAGERSTROM | MARK |
| HILL-HART | RUSSELL B | LAMBERT | KIRBY |
| HINCKLEY | SARA S | LANDINI | RICHARD |
| HODGES | IVELONE L | LARSEN | DAVID |
| HOLE | HARFIELD | LATTERELL | KIM L |
| HOLMES | KRYS | LAUGHING WATER | |
| HOLZ | MOLLY | LAUTERBACK | MARTHA |
| HOOKE | VILATE B | LEACH | COLLIN |
| HOUSER | MARJORIE M | LEBAR | JAMES H |
| HOWE | CHARLES M | LEOW | MATT |
| HUAT | NOREEN | LIGHTFOOT | LINDA |
| HUDSON | ANN E | LLOYD | KATHY |
| HUDSON | SHIRLEY J | MACDONALD | NANCY |
| HUGHES | ROBERT D | MANLEY | JIM |
| HULL | ANNIE | MARBLE | HARRIET |
| HULTGREN | VIVIAN | MARTIN | LARRY J |
| HUNT | KATE | MARTIN | R CRAIG |
| HURDLE | JOAN | MARTINIAK | MARITA |
| HUTCHISON | ALICE F | MATHESON | MARJORIE |
| IRWIN | SHELLEY | MAZZOLA | DONALD |
| ISRAEL | NELLIE | MCCAULEY | GEORGE |
| JACKSON | RALPH | MCGILLIURAY PH D | ROBERT G |
| JAYNES | BILL | MCLANE | NANCY |
| JENNINGS | GERRY | MCLARTY | MARGRITA |
| JESKE | GERRIE | MCMILLAN | JANET |
| JETER | B ELLOIE | MCNEAL | HARRY |
| JOHNSON | VICTOIRE & JERRY | MERRIFIELD | EDWARD |
| JOHNSON | ANNE | MERRILL | DAVID |
| JOHNSON | ELI | MEST | JOHN S |
| JOHNSTON | JOAN | MEYER | ROLANE |
| JORON | LEO | MIDDAGH | LARRY |
| JOURDONAIS DVM | BECKY L | MONTAGNE | JOHN |
| JUDGE | CAROL | MUELLER | ANGELA |
| KEHLER | BILL | MURPHY | ELLYN |
| KENT | PAUL & VICKI | MURRAY | PENNY |
| KETTERMAN | CHARLES N | NEFF | RICHARD A |
| KIELY | JUDITH M | NELSON | EDWARD J |
| KIEROSN | MOLLIE | NELSON | LEIF |
| KILLION | JERALD | NICKMAN MD | NORMAN J |
| KINGSLAND | MARGARET C | NIGH | SARAH P |
| KINUCAN | KEN & EDITH | NOBLES | E TERRILL |
| KINZFOGL | KATHY | NOONAN | ROBERT C |
| KLINGMAN | VERN L | OBRIEN | MARY B |
| OCONNOR | SUSANNE | SCHARF | DARRELL |

| Last Name (s) | First Name(s) | Last Name (s) | First Name(s) |
|---------------|-----------------|------------------|---------------------|
| OTOOLE | JAMES J | SEYMOUR | RANDY |
| PALMER | SHIRLEY | SHACKLETON | RAY |
| PARKS | BRIAN | SHARP | PATRICIA |
| PAULSEN | JIM | SHERMAN | ROGER |
| PAULSEN | GEORGEANNE | SHORS | RICHARD A |
| PERELMAN | KENT B | SHOVERS | BRIAN |
| PEURA | RACHEL | SHURA | LANA |
| PIERSON | TONA M | SICOTTE | PATRICIA C |
| PILGRIM | KRISTIE L | SIKORA | EDWARD J |
| PLOUZEK | MORLENE | SIMMONS | PAT |
| POND | ROBERT W | SMITH | IRMELI |
| PRATT | GERTRUDE | SMITH | NAOMI |
| PUGH | DALE & JEANNE | SCHARF | DARRELL |
| RACHLIS | SANDRA | SCHEUERING | PAULA |
| RAFFETY | ROBERT | SCHMIDT | LOUIS |
| REAM | CATHERINE | SCHOONEN | TONY & MARGARET |
| REAM | TARN | SCHWARZKOPF | ELEANOR |
| REDMOND | CARMEN D | SECREST | AMY |
| REINHARDT | HOWARD | SEEL | MAC |
| REITER | BARB | SETTER | MARION & J |
| RICHARDS | PAUL | SEYMOUR | RANDY |
| RICHARDSON | GAIL & JOHN | SHACKLETON | RAY |
| RIDER | ANNA MARIE | SHARP | PATRICIA |
| RIESCH | PAULA | SHERMAN | ROGER |
| RIVERS | JANET C | SHORS | RICHARD A |
| ROBBINS | MARLA A | SHOVERS | BRIAN |
| ROBERTS | JULIA B | SHURA | LANA |
| ROBERTS | CAROL | SICOTTE | PATRICIA C |
| ROBERTS | VICTOR | SIKORA | EDWARD J |
| ROBERTS | RICHARD & JANET | SIMMONS | PAT |
| ROCKAFELLOW | R N | SMITH | IRMELI |
| ROGERS | ROXANNE | SMITH | NAOMI |
| ROOT | JAMES | SMITH | SARA |
| ROSELL | ANTOINETTE | SMITH | JUDY |
| ROSS | BARBARA | SMITH | JEAN E |
| ROWLAND | MARY | SMITH | ANNICK |
| RUMLEY | CONSTANCE M | SMITH | PENDENCE & PRUDENCE |
| SANDERS | PATRICK M | SMITH | JEFFREY |
| SAVINSKI | MARK T | SOEHREN-LAWRENCE | DOUGLAS & JOETTA |
| SAYLOR | JULIA M | SOUTHALL MD | KENDALL CHRIS |
| SCHARF | DARRELL | SPAGNOLI | NANCY |
| SCHEUERING | PAULA | SPETTIGUE | E B |
| SCHMIDT | LOUIS | SPEYER | TIMOTHY |
| SCHOONEN | TONY & MARGARET | STAIGMILLER | JUDY |
| SCHWARZKOPF | ELEANOR | STAUFFER | KATHRYN |
| SECREST | AMY | STAUFFER | PHILIP N |
| SEEL | MAC | STENZ | ROBERT W |
| SETTER | MARION & J | STEPHENS | RUTH |

| Last Name (s) | First Name(s) | Last Name (s) | First Name(s) |
|---------------|---------------|---------------|------------------|
| STEVENS JR | BOB | WALTNER | RICHARD & BONNIE |
| STEVENSON | CHARLES K | WANG | LINNEA M |
| STOLL | ILEN | WARD | DORRIS |
| STUTZBACH | STEPHEN J | WAREHIME | HELEN |
| SULLIVAN | THOMAS Q | WATSON | VICKI |
| SULLIVAN | ROGER | WEBER | GORDON G |
| SWEARINGEN | WILL | WEBSTER | JACK |
| SYKES | JO | WEEKS | JEAN G |
| TAYLOR | ELAINE E | WELLES | JO |
| TAYLOR | MARY M | WELTZIEN | O ALAN |
| TEAGUE JR | CHARLES P | WERNER | JOHN K |
| THOMAS | DAVID E | WHITE | MARSHALL |
| THOMAS | LORRY | WHITNEY | DONNA M |
| TOMASLEOSKI | NINA | WILCOX | PHYLLIS |
| TOMICH | ROBERT | WILCZYNSKI | PETER T |
| TRAUTH | CLAIRE E | WILLIAMS | WENDY |
| TROSELLO | MARIBETH | WILLIAMS | JOHN & BEVERLY |
| TUNNOCK | SCOTT | WILSON | SETH |
| TURMAN | KATHLEEN | WILSON | HELEN F |
| VAN ARSDALE | SCOTT | WILSON | DAVID K |
| VASQUEZ | NED | WILSON | CLAIRE |
| VILLINGER | BEVERLY | WINTHROP | JESSUP |
| VINCENT | VIRGINIA | WOOD | DORIS W |
| WALDRON | SUSAN | WYATT | WILLIAM H |
| WALLACE | STEPHEN | YOUNG | BRUCE A |
| WALLER | HELEN | YOUNG | ALISON |

Citizens for Clean Energy Petition

Finally, 1,041 persons signed a petition circulated by Citizens for Clean Energy in Great Falls against the HGS. The petition reads as follows (italics added):

PETITION OPPOSING PROPOSED GF COAL PLANT

TO: Great Falls City Commissioners, Cascade County Commissioners, Montana DEQ, U.S. Department of Agriculture, Senator Conrad Burns, Senator Max Baucus, Rep. Dennis Rehberg

WE, THE UNDERSIGNED, wish to voice our opposition to the proposed Great Falls coal plant (Highwood Station). We are opposed to the building of any coal plant; we believe that the City of Great Falls would be better served by developing various renewable energy resources such as wind and solar power, and filling additional power needs by entering into long-term power contracts with the owners of the dams in Great Falls. In light of global warming, we believe it is irresponsible to build a plant which contributes to global warming and which may not be economical to operate in the future.

If a coal plant is to be built, we insist that it actually be the best available technology, to minimize or eliminate pollution and greenhouse gases, and mitigate costs by creating salable

byproducts. We believe Integrated Gasification Combined Cycle (IGCC) is the technology to use.

List of Comment Categories and Codes

Table L-3. List of Comment Categories and Codes

| Subject Category | Category Code | Topics Covered By Comments | Page number |
|-------------------------------|---------------|--|-------------|
| General | GEN-100 | General comments on DEIS and Proposed Action | L-80 |
| Purpose and Need | PUR-200 | Stated need for a 250-MW power plant | L-121 |
| Alternatives | ALT-300 | General comments on treatment of alternatives | L-136 |
| | ALT-301 | Efficiency and conservation | L-145 |
| | ALT-302 | Solar energy | L-148 |
| | ALT-303 | Wind energy | L-150 |
| | ALT-304 | Hydroelectric energy | L-157 |
| | ALT-305 | Integrated Gasification Combined Cycle (IGCC) | L-158 |
| | ALT-306 | Other potential power plant locations in state | L-169 |
| | ALT-307 | No Action Alternative | L-171 |
| | ALT-308 | Proposed Action (Highwood Generating Station) | L-172 |
| | ALT-309 | Alternative Site (power plant at Industrial Park site) | L-179 |
| | ALT-310 | Salem site alternatives dismissed | L-182 |
| Soils, Topography and Geology | STG-400 | Erosion, changes in landform, soil contamination | L-183 |
| Water Resources | WAT-500 | Water quality and quantity issues | L-186 |
| Air Quality | AIR-600 | General comments on air quality impacts | L-198 |
| | AIR-601 | Criteria pollutants | L-209 |
| | AIR-602 | Hazardous Air Pollutants (HAPs) including mercury emissions and effects | L-217 |
| | AIR-603 | Greenhouse gas emissions and climate change | L-239 |
| | AIR-604 | Visibility impairment from air pollutants | L-252 |
| Biological Resources | BIO-700 | Biological resources impacts, including flora and fauna | L-255 |
| Acoustical Environment | ACO-800 | Noise-related issues | L-260 |
| Recreation | REC-900 | Effects on outdoor recreation | L-262 |
| Cultural Resources | CUL-1000 | Great Falls Portage National Historic Landmark and other cultural issues | L-264 |
| Visual Resources | VIS-1100 | Visual resource impacts and aesthetic issues | L-278 |

| | | | |
|--|----------|---|-------|
| Transportation | TRA-1200 | Transportation impacts and issues | L-280 |
| Farmland and Land Use | FLU-1300 | Effects on farmland, and planning and zoning issues | L-286 |
| Waste Management | WAS-1400 | Handling and disposal of wastes like ash | L-289 |
| Human Health and Safety | HHS-1500 | Effects on human health from power plant construction, operation, and contaminants | L-294 |
| Socioeconomics | SOC-1600 | Socioeconomic issues, including income, financing, employment, tourism, and quality of life | L-299 |
| Environmental Justice/Protection of Children | EJP-1700 | Effects on minorities (such as Native Americans), low-income populations and children | L-307 |
| Cumulative Impacts | CUM-1800 | Cumulative impacts in all resource areas | L-313 |

Table L-4. Alphabetical List of Commenters and their Comments

| Name | Type of Comments* | ID# | Comment Codes |
|---|-------------------|------|---|
| Ackerman, Terri | W | C190 | 100-19, 604-1, 1700-5 |
| Albertson, Joyce | W | C274 | 100-19, 603-1, 1500-2 |
| Allaire, Robin | O | C1 | 300-1, 600-1, 602-1, 603-1 |
| Alvarez, Abel | W | C206 | 100-19, 602-1, 602-5 |
| Anderson, David | W, O | C2 | 100-1, 308-2 |
| Anderson, Lynn | W | C311 | 100-19, 300-1 |
| Anderson, Sharon | W | C3 | 100-2, 100-3, 100-4, 602-1 |
| Arca, Ronni | W | C200 | 602-5 |
| Armstrong, Henry L. | W | C269 | 100-40, 305-1, 1700-1 |
| Armstrong, Leila | W | C305 | 100-19, 200-9, 300-2, 600-1 |
| Armstrong, Stuart L. | P | C253 | 200-9, 300-4, 603-1, 1500-2 |
| Azure, Vickie J. | W | C196 | 100-19, 1700-5 |
| Baiz, Claire | O | C4 | 300-1, 303-1, 305-1, 603-1, 603-2, 1600-1 |
| Baker, Mallory | W | C194 | 100-4, 100-19, 300-1, 602-1 |
| Ball-Giep, Debbie | O | C5 | 100-5, 303-2, 304-1, 308-2 |
| Baxter, Bruce | P | C215 | 200-9, 300-4, 603-1, 1500-2 |
| Beartooth Electric Cooperative, Carbon County Commission – John Prinkki | O | C6 | 308-2, 603-3 |
| Beartooth Electric Cooperative – Bob Walker | O | C7 | 200-1, 200-2, 200-3 |
| Becker, Julia | W | C8 | 100-3, 100-6, 100-7, 100-8, 100-9, 100-10, 200-4, 300-1, 300-2, 300-3, 302-1, |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| | | | 305-1, 305-2, 307-1, 307-2, 308-3, 308-4, 500-1, 500-2, 500-3, 600-2, 600-3, 600-21, 603-4, 604-1, 700-1, 800-1, 900-1, 1000-1, 1300-1, 1400-1, 1400-2, 1600-1, 1600-2, 1600-3, 1700-1, 1700-2 |
| Bell, James P. | W | C248 | 602-1, 603-1, 604-1, 1000-21, 1600-14 |
| Bennett, Dan | W | C166 | 300-2, 300-4 |
| Bergstein, Diane | P | C236 | 100-14, 200-9, 300-4, 603-1, 1500-2 |
| Bernard, Joanne | O | C9 | 300-2, 306-1, 307-1, 700-1, 1200-1 |
| Biehl, Daniel S. | W | C10 | 100-11, 100-12, 200-5, 200-6, 301-1, 303-3, 303-4, 307-1, 602-31, 603-5, 700-2, 1500-2 |
| Bison Engineering – Jeff Chaffee | O | C11 | 601-1, 1500-1 |
| Bjornlie, Harvey C. | W | C12 | 200-5, 200-7, 305-2, 603-1 |
| Bjornlie, Sheila | W | C13 | 100-14, 100-15, 304-1 |
| Blaine County Farmers Union – Barb Hauge | W | C162 | 100-19 |
| Blane, Monica J. | W | C199 | 100-19, 1500-2 |
| Blood, W.A. | P | C210 | 200-9, 300-4, 603-1, 1500-2 |
| Bocock, Charles | W, O | C14 | 100-16, 100-17, 200-8, 500-2, 500-4, 602-1, 602-2, 602-3, 1000-2, 1300-2, 1400-1, 1400-3, 1400-4, 1400-5 |
| Boilermakers in Montana, Local 11 – Robert K. Winger | W | C267 | 100-1, 100-5, 1600-11 |
| Boysun, Randal J. | W, O | C15 | 5-100, 25-100 |
| Bradley, Patricia | W | C16 | 100-14, 100-19, 200-4 |
| Breeden, Janet | P | C278 | 200-9, 300-4, 603-1, 1500-2 |
| Burgess, Bill | W | C331 | 100-16, 601-2, 602-1, 1500-2 |
| Burgess, Cindy J. | W | C314 | 602-1, 603-1, 603-18 |
| Burns, Tracy | W | C295 | 100-19, 200-9, 300-4, 603-1, 1500-2 |
| Cabigas, Leah | W | C201 | 602-5, 1700-2, 1700-5 |
| Carman, Denita | W | C176 | 602-1, 602-5 |
| Carrick, Patricia | W | C17 | 100-14, 100-20, 200-9, 300-4, 601-2, 1500-2 |
| Chippewa Cree Business Committee | W | C277 | 100-19, 1700-2 |
| Chippewa Cree Tribal Council, Montana Legislature – Jonathan Windy Boy | O | C18 | 100-15, 100-21, 600-4, 1400-1 |
| Citizens for Clean Energy – Cheryl M. Reichert | W | C20 | 100-15, 100-17, 100-19, 100-22, 100-23, 100-24, 100-25, 200-4, 200-10, 200-11, 200-12, 200-13, 200-14, 200-15, 200-16, |

| Name | Type of Comments* | ID# | Comment Codes |
|---|-------------------|------|--|
| | | | 303-20, 305-2, 305-3, 305-4, 307-1, 308-5, 309-1, 500-3, 601-2, 602-1, 602-3, 602-4, 602-5, 603-1, 603-2, 603-6, 604-1, 700-1, 900-1, 1000-2, 1100-1, 1200-1, 1400-1, 1600-1, 1600-2, 1700-1, 1700-2 |
| City of Great Falls – Donna Stebbins | O | C19 | 308-2, 602-1 |
| City of Great Falls/Cascade County Historic Preservation Office – Ellen Sievert and Ken Robison | W | C180 | 1000-12 |
| City of Fort Benton – Mayor Richard D. Morris | W | C315 | 200-3, 300-1, 500-3, 603-1, 1500-1 |
| City of Great Falls – John Lawton | O | C21 | 200-17 |
| City of Great Falls – Jordan Love | O | C22 | 100-26 |
| City of Havre – Councilwoman Emily Mayer Lossing, Ward IV | W | C329 | 100-19, 300-1, 602-1 |
| Clark, Gerald R. | W | C317 | 300-2, 303-1, 603-2, 1001-2, 1200-2 |
| Clean Air Task Force – John W. Thompson | W | C23 | 300-2, 305-1, 305-2, 305-5, 305-6, 305-7 |
| Click, C. J. | W | C322 | 100-19 |
| Collins, Carol | O | C24 | 100-27, 303-1, 305-6, 305-7, 307-1, 600-3, 1600-1 |
| Crawford, Wayne and Ann | W | C257 | 100-19 |
| Crete, Ronald A. | W | C25 | 100-28, 300-2, 300-5, 305-2, 307-1, 603-4 |
| Dagenais, Phyllis | P | C218 | 200-9, 300-4, 603-1, 1500-2 |
| Dakin, Bill and Sarah | W | C297 | 100-19, 100-82, 200-5, 303-1, 603-1 |
| DayChild, Henry, Sr. | O | C26 | 200-15, 300-1, 600-4 |
| Decker, Eileen | P | C213 | 200-9, 300-4, 603-1, 1500-2 |
| Deligdisch, Andree | O | C27 | 100-29, 303-5, 500-5, 600-3 |
| Denny, Aldean | W | C183 | 1700-5 |
| Department of the Interior (U.S.) – Robert F. Stewart | W | C28 | 500-6, 500-7, 500-8, 500-9, 600-5, 800-2, 1000-3, 1000-4, 1000-5, 1000-6, 1000-18, 1100-2, 1100-3 |
| Deveny, Christine | P | C227 | 200-9, 300-4, 603-1, 1500-2 |
| Dieruf, Bob | W | C255 | 100-4 |
| Dieruf, Carli | W | C256 | 100-4 |
| Dieruf, Lenore | W | C308 | 100-13, 100-19, 300-1 |
| Dirkson, Pat | W | C296 | 200-3, 600-22 |

| Name | Type of Comments* | ID# | Comment Codes |
|---|-------------------|------|--|
| Dobyns, Kris | W | C332 | 100-48 |
| Dolman, Aart | W, O | C29 | 100-7, 100-14, 100-30, 100-31, 302-2, 303-6, 600-3, 602-6, 1000-7, 1000-8, 1000-9, 1400-1, 1400-6 |
| Dopler, Pat | W | C30 | 200-5, 301-6, 302-3, 303-7, 603-7 |
| Downs, Dan | O | C31 | 100-32, 300-6, 303-2 |
| Duran, Willdette M. | W | C203 | 602-5 |
| Durham, Margery | W | C32 | 303-8, 308-4, 1600-4 |
| Dutchak, Nancy M. | W | C259 | 100-20, 305-1 |
| Eagleman, Ira | W | C192 | 100-19, 1700-2 |
| Eckenstein, Vicki | W | C33 | 308-7, 600-6, 601-3, 603-4, 604-1, 1600-5 |
| Elden, Cari | W | C291 | 100-19, 303-1 |
| Electric City Power, Inc. – Coleen Balzarini | W, O | C34 | 200-17, 200-18 |
| Ellingsen, Valley | P | C214 | 200-9, 300-4, 603-1, 1500-2 |
| Emerson, Jim | W | C35 | 100-14, 100-24, 500-3, 603-1 |
| Engleson, Jerry L. | W | C292 | 100-13, 200-5, 900-1 |
| Enk, Michael | W | C334 | 100-13, 100-16, 200-9, 300-4, 500-3, 603-1 |
| Environmental Protection Agency (U.S.), Region 8 – John Wardell | W | C36 | 100-33, 100-34, 303-19, 305-2, 305-8, 306-1, 306-2, 308-8, 400-1, 500-2, 500-5, 500-10, 500-11, 500-12, 500-13, 600-7, 601-4, 601-5, 601-6, 601-7, 601-8, 602-7, 603-8, 603-9, 604-2, 700-3, 700-4, 700-5, 1000-10, 1200-3 |
| Erickson, Pamela | W | C335 | 100-19, 600-1, 603-1 |
| Evans, Allen | O | C37 | 100-5, 100-35 |
| Federal Aviation Administration – Clark Desing | W | C181 | 1200-19 |
| Federspiel, Laura | O | C38 | 100-14, 600-3, 1500-2, 1600-6 |
| Ferenstein, Jennifer | P | C243 | 200-9, 300-4, 603-1, 1500-2 |
| Fergus Electric Cooperative – Joe Dirkson | W, O | C41 | 100-1, 100-5, 100-36, 600-22 |
| Fergus Electric Cooperative – David Dover | O | C39 | 100-36, 200-3 |
| Fergus Electric Cooperative – Robert Evans | O | C40 | 200-3 |
| Fergus Electric Cooperative – Guy Johnson | O | C42 | 100-5, 200-3, 200-19 |
| Fergus Electric Cooperative – Joe Pirrie | O | C43 | 100-35, 303-2 |
| Fergus Electric Cooperative – | W | C275 | 100-1, 1600-11 |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| Leo Solf | | | |
| Fergus Electric Cooperative – Scott Sweeney | W, O | C44 | 100-18, 100-36, 305-9, 600-1 |
| Fiers, Mary F. | W | C289 | 604-1 |
| Fiers, Thomas A. | W | C290 | 604-1 |
| Fisher, Carol | W | C302 | 100-14, 100-19, 100-16, 300-1, 500-3, 602-1 |
| Fisher, Joanne | W | C167 | 100-16, 600-3, 603-2, 1500-2, 1700-1 |
| Fisher, Richard | W | C168 | 100-14, 100-16, 300-3, 1500-2, 1700-1 |
| Floyd, Jaybe | W | C45 | 300-2, 300-3, 303-3, 306-1, 800-3, 1600-1 |
| Fort Belknap Indian Community – Julia Doney, President | W | C320 | 100-19, 100-28, 307-1, 602-2, 1700-2, 1700-6 |
| Foster, Maureen | W | C304 | 100-13, 100-19, 300-2 |
| Fraser, Scott | W | C46 | 100-14, 100-37, 300-2 |
| Fredlund, Dale | P | C232 | 200-9, 300-4, 603-1, 1500-2 |
| Freyholtz, Mert | O | C47 | 308-9, 600-8 |
| Freyholtz, Vicki | O | C48 | 100-14, 100-38, 100-39, 300-3, 306-3, 602-8, 603-1, 603-2 |
| Gallagher, George | O | C49 | 100-5 |
| Gardipee, Kenneth | W | C198 | 100-19, 1700-2, 1700-5 |
| Gessaman, Kathleen Z. | W | C50 | 100-15, 200-4, 301-1, 302-4, 307-1, 307-3, 308-4, 601-2, 601-3, 601-9, 601-10, 602-1, 602-9, 1000-11, 1800-1 |
| Gestring, Charles | W | C288 | 300-1, 603-1 |
| Gibson, Susan | W | C281 | 100-15 |
| Golder, Nick | W | C328 | 100-19, 300-1 |
| Good, Mark | W | C164 | 200-5, 303-3, 602-1, 603-1, 603-2, 603-6 |
| Gotshalk, Richard | W | C319 | 100-16, 200-9, 300-4, 600-1, 603-1, 1500-2 |
| Gniadek, Steve | P | C217 | 200-9, 300-4, 603-1, 1500-2 |
| Grant, Charles | O | C51 | 100-40, 300-4, 1500-3 |
| Gray, Randy | O | C52 | 100-36, 200-3, 305-9 |
| Gupton, Liz | W | C283 | 100-19, 300-2, 301-1, 603-1 |
| Hamlett, Brad | O | C53 | 100-5, 500-14, 600-9 |
| Hankins, Lester (Butch) | W, O | C54 | 100-14, 100-19, 100-23, 100-41, 200-8, 1500-2 |
| Hansen, Laulette L. | W | C336 | 100-19, 100-48, 300-1 |
| Hanson, Victor H. | W | C55 | 100-41, 500-3 |
| Hardiman, Lisa Lotte | W | C165 | 100-3, 200-5, 305-3, 500-3, 600-3, 602-1, 700-1 |
| Hari, Robert | W | C163 | 100-5, 100-37 |

| Name | Type of Comments* | ID# | Comment Codes |
|---|-------------------|------|--|
| Hastings, Teresa | P | C239 | 200-9, 300-4, 500-3, 603-1, 1500-2 |
| Haug, Catherine | W | C56 | 100-14, 100-20, 200-4, 1500-2 |
| Heffern, Jacquie | W | C279 | 100-4, 100-19, 1500-2 |
| Heffern, Roy | P | C240 | 200-9, 300-4, 303-1, 603-1, 1500-2 |
| Helm, Gary | O | C57 | 100-36, 200-3, 307-4, 600-4 |
| Helvey, Patricia B. | P | C245 | 200-9, 300-4, 603-1, 1500-2 |
| Hemstad, Phyllis | W | C171 | 100-19, 100-49, 307-1 |
| Henderson, Janet | W | C58 | 100-14, 100-16, 300-2, 303-9, 307-1, 500-3, 1000-1 |
| Henderson, Noel | W | C293 | 100-48 |
| Henneford, J. R. | W | C264 | 100-14, 300-1, 300-3, 305-1 |
| Henneford, Nancy M. | W | C263 | 100-14, 100-19, 300-1, 305-1 |
| Hilden, Alan D. | W | C59 | 100-14, 200-5, 300-4 |
| Hines, Jessica | W | C60 | 100-19, 308-3, 601-2 |
| Holmes, Krys | P | C224 | 200-9, 300-4, 603-1, 1500-2 |
| Horn, Claud A. and Brenda | W | C179 | 100-14, 100-19, 303-1, 600-1 |
| Horton, Daniel P. | W | C205 | 100-19, 300-19, 302-4, 304-1 |
| Howe, Charles M. | P | C228 | 200-9, 300-4, 603-1, 1500-2 |
| Hoy, Mike | W | C61 | 100-20, 200-9, 300-4, 308-10, 603-1, 1500-2 |
| Hubbard, John | O | C62 | 100-42, 1500-2 |
| Humphrey, Lucretia | W | C63 | 100-19, 300-2, 303-1, 1500-2 |
| Hyndman, Donald W. | W | C64 | 300-5, 300-8, 305-3, 603-1, 603-2 |
| International Electrical Workers 33 – Curtis Sweet | O | C65 | 603-10 |
| International Union of Operation Engineers, Local 400 – Earl Salley | O | C66 | 100-5 |
| James, W. Dudley | W | C327 | 100-7 |
| Jennings, Doris | W | C301 | 100-4, 100-19, 300-1 |
| Jennings, Gerry | W | C284 | 100-79, 300-3, 602-1, 603-1, 1600-1 |
| Johnson, E.A. | W | C67 | 100-5, 100-36 |
| Johnson, Jan | W | C254 | 100-4 |
| Jolley, Mary | O | C68 | 100-7, 305-6, 305-10, 900-1 |
| Jones, Cedron | W | C69 | 100-19, 100-43, 302-4 |
| Jussila, Neil R. | W | C324 | 100-5 |
| Kaufmann, Christine | W | C70 | 100-20, 603-2 |
| Kendy, Eloise | W | C71 | 100-44, 500-3, 500-5, 500-16, 500-17 |
| Kent, Paul and Vicki | W | C72 | 100-14, 100-19, 200-4 |
| Kingsland, Margaret C. | P | C220 | 200-9, 300-4, 603-1, 1500-2 |
| Kington, Jacquelyn | P | C310 | 200-9, 300-4, 603-1, 1500-2 |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| Klingman, Vern; Russ Doty, Tom Towe | W | C73 | 300-3, 305-1, 305-6, 305-11 |
| Klobofski, Denis | W | C299 | 100-19, 305-7, 1500-2 |
| Kralj, Larry | O | C74 | 100-14, 601-2, 1600-1 |
| LaBuff, Lorna | P | C231 | 200-9, 300-4, 603-1, 1500-2 |
| LaCassee, Craig | O | C75 | 603-1, 603-4 |
| Larsen, David | P | C242 | 200-9, 300-4, 603-1, 1500-2 |
| Lassila, Bob | O | C76 | 307-1, 308-10 |
| Lewin, Hilary | O | C77 | 100-3, 100-23, 100-45, 100-46, 100-47, 100-48, 200-26, 300-2, 305-2, 307-5, 603-2 |
| Lewin, Stuart | W, O | C78 | 100-7, 100-17, 100-19, 100-49, 100-50, 300-2, 300-3, 300-10, 304-1, 305-2, 400-2, 400-3, 600-10, 600-11, 600-12, 600-13, 601-3, 602-1, 602-4, 602-6, 602-10, 603-2, 604-1, 1300-1, 1600-1, 1800-2 |
| Lewis and Clark Interpretive Center Foundation – Debbie M. Churchill | W | C79 | 1000-12 |
| Lewis and Clark Trail Heritage Foundation – Wendy Raney | W | C144 | 1000-18 |
| Liebert, Richard | W, O | C80 | 100-28, 100-51, 100-52, 100-53, 100-54, 100-55, 100-56, 300-2, 300-4, 300-11, 301-2, 302-4, 303-8, 303-10, 303-11, 303-12, 303-13, 303-14, 303-15, 303-16, 303-17, 304-1, 305-3, 305-6, 305-10, 305-12, 305-13, 305-14, 306-2, 306-4, 307-6, 308-11, 308-12, 308-13, 308-14, 309-2, 309-3, 309-4, 309-5, 309-6, 309-7, 400-4, 500-2, 500-10, 500-18, 500-19, 602-3, 602-4, 602-11, 603-1, 603-2, 603-6, 603-9, 603-11, 604-1, 800-4, 800-5, 900-1, 900-2, 1000-2, 1000-4, 1000-13, 1000-18, 1100-4, 1200-1, 1300-3, 1300-4, 1400-7, 1500-4, 1500-5, 1600-1, 1600-7, 1600-8, 1700-3, 1800-3 |
| Lindlief-Hall, Brenda | W | C81 | 100-20, 300-2, 601-2, 603-1, 1700-1 |
| Little, Gloria | W | C204 | 100-19, 300-2, 602-5, 603-1, 1500-2 |
| Little Shell Chippewa Tribe – James Parker Shield | W | C182 | 1000-20 |
| Longhart, Fred L. | W | C82 | 100-19, 300-1, 303-1, 603-1 |
| Makich, Kathleen O. | W | C261 | 100-19, 300-2 |
| Makich, Max A. | W | C173 | 100-19 |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| Malsam, Russ | O | C83 | 100-5, 100-57, 100-58 |
| Mathsen, Ronald | O | C84 | 100-16, 100-19, 100-45, 303-1, 305-2, 603-5, 603-6, 603-7, 603-12 |
| Mayernik, Stephen V. | W | C266 | 306-1, 307-1, 1300-1, 1400-1 |
| Mazzola, Donald | P | C235 | 200-9, 300-4, 603-1, 1500-2 |
| McBroom, Scott T. | W | C265 | 100-4, 300-1 |
| McDougal, Susanna | W | C85 | 200-9, 300-4, 303-1, 1500-2 |
| McLaughlin, William C. | W | C86 | 100-14, 100-19, 200-4, 200-5 |
| McRae, Douglas S. | W | C318 | 305-4, 500-3 |
| Meissner, Mary | W | C175 | 100-19, 500-3, 600-1 |
| Merasty, Robin T. | W | C268 | 100-19, 1700-5 |
| Mercer, Colleen | W | C87 | 200-9, 300-1, 304-1, 600-3, 602-1, 603-1, 1500-2 |
| Meyer, Curt | W | C88 | 100-14, 300-1, 305-1, 603-1, 603-4 |
| Meyer, Rolane | P | C209 | 200-9, 300-4, 603-1, 1500-2 |
| Meyers, Nathan | W | C208 | 100-4, 1600-1 |
| Mid-Yellowstone Electric Cooperative – Ted Church | W, O | C89 | 200-21 |
| Mid-Yellowstone Electric Cooperative – William Fitzgerald | O | C90 | 100-1, 100-59 |
| Mid-Yellowstone Electric Cooperative – Judi Knapp | W | C91 | 100-1, 100-36, 100-59 |
| Mid-Yellowstone Electric Cooperative – Larry Williams | W | C92 | 100-1, 100-36, 100-59 |
| Miller, Donald | W | C260 | 603-3 |
| Moe, Duane N. | W | C294 | 100-19, 200-5, 303-10, 602-4, 603-1, 603-2 |
| Montana Coal Council – Bud Clinch | O | C93 | 100-36, 600-1 |
| Montana Department of Transportation – Jim Skinner | W | C94 | 1200-4, 1200-5, 1200-6, 1200-7, 1200-8, 1200-9, 1200-10, 1200-11, 1200-12, 1200-13, 1200-14, 1200-15, 1200-16 |
| Montana Ecosystems Defense Council – Steve Kelly | W | C312 | 100-16, 100-41, 200-9, 300-4, 500-3, 603-1, 1500-2 |
| Montana Electric Cooperatives' Association – Gary Wiens | W | C178 | 200-3, 305-9 |
| Montana Environmental Information Center – Pat Judge and Anne Hedges | W, O | C95 | 100-50, 100-59, 100-60, 100-61, 200-4, 200-5, 200-22, 200-23, 200-24, 200-25, 300-2, 300-3, 300-4, 500-3, 600-10, 600-14, 602-1, 602-2, 602-5, 602-7, 602-12, 602-13, 602-14, 602-15, 603-1, 603-2, 603-4, 603-6, 603-7, 603-13, 1600-9, 1600-10, 1800-4 |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| Montana Environmental Trade Association – Don Allen | O | C96 | 100-5, 100-36, 100-62, 300-12 |
| Montana House of Representatives – Rep. George Golie | W | C306 | 100-5, 100-6, 100-36, 200-3, 307-4, 500-14, 602-8, 1600-11 |
| Montana Preservation Alliance – Chere Jiusto | W | C97 | 1000-4, 1000-18 |
| Moore, John | W | C98 | 307-1, 308-4 |
| Moos, Ted | W | C280 | 100-13, 100-14, 100-19 |
| Morgan, Susan | P | C223 | 200-9, 300-4, 603-1, 1500-2 |
| Morris, Pamela | O | C99 | 301-3, 602-1, 604-1 |
| Morrow, Roberta | W | C202 | 100-19, 1500-2, 1700-5 |
| Murphy, Robert A. | W | C188 | 100-19, 1700-5 |
| Murri, Val & Karen | W | C100 | 100-19, 100-63, 600-14 |
| National Trust for Historic Preservation – Amy Cole | W | C101 | 1000-18 |
| Newman, Joe | W | C298 | 100-19, 603-1, 603-7 |
| Norgaard, Roger | O | C102 | 100-19, 700-1 |
| North Central Montana Building and Construction Trades – Duane Mellinger | O | C103 | 100-5, 100-64, 603-3 |
| Northern Cheyenne Tribe – Eugene Little Coyote | W | C272 | 100-19, 601-2, 602-1 |
| Northern Plains Resource Council – Mark Fix | W | C104 | 100-28, 100-65, 100-66, 300-9, 303-1, 304-1, 500-3, 500-20, 603-1, 603-5, 603-10, 1400-8, 1800-5 |
| O'Neill, Joanne E. | W | C286 | 200-9, 300-4, 603-1, 1500-2 |
| Palmer, Jeffrey C. | W | C313 | 100-14, 300-1 |
| Papoulis, Mary | W, O | C105 | 100-16, 100-67, 100-68, 200-22, 200-26, 301-1, 305-2, 603-5, 1000-18 |
| Peck, Kathryn E. Peck | P | C282 | 200-9, 300-4, 603-1, 1500-2 |
| Pfister, Ellen | W | C106 | 100-69, 300-1, 300-4, 301-1, 1600-9 |
| Piapot, Cheenah | W | C187 | 100-76, 602-5, 1700-5 |
| Plouzek, Morlene | P, W | C222 | 100-19, 200-9, 300-4, 603-1, 1500-2 |
| Plumbers and Pipe Fitters, Local 41 – Olaf Stimac | W, O | C107 | 100-70 |
| Poremba, Maureen | W | C108 | 200-9, 300-4, 603-1, 1500-2 |
| Portage Route Chapter, Lewis & Clark Trail Heritage Foundation, Inc. – Willard R. Weaver | W | C177 | 1000-12 |
| Putzker, Rob & Joanne | W | C109 | 100-71 |
| Quinn, Bob | O | C110 | 300-13, 303-7, 303-10, 305-2, 600-4, 602-16, 1300-1 |

| Name | Type of Comments* | ID# | Comment Codes |
|--------------------------------------|-------------------|------|--|
| Ragged Robe, Wabusk | W | C193 | 100-19, 602-1, 1700-2 |
| Raining Bird, Brandon | W | C197 | 1500-2 |
| Rammer, William A. | W | C321 | 100-19, 601-2 |
| Rana, Paul J. | P | C247 | 200-9, 300-4, 600-1, 603-1, 1500-2 |
| Ransdell, Hilary | W | C111 | 100-15, 100-17, 100-19, 100-45, 100-72, 100-73, 200-16, 300-2, 307-7, 601-11, 602-15, 1600-1 |
| Redmond, Carmen D. | P | C238 | 200-9, 300-4, 603-1, 1500-2, 1800-8 |
| Reichert, Arlyne | W | C262 | 100-15, 100-19, 300-3, 1000-2 |
| Rezeates, Larry | O | C112 | 100-19, 100-74, 100-75, 1500-6 |
| Richards, Paul | P | C221 | 200-9, 300-4, 603-1, 1500-2 |
| Richardson, Gail and John | P | C233 | 100-14, 200-4, 200-9, 300-4, 603-1, 1500-2 |
| Richter, Cindy | W | C113 | 300-4, 308-4 |
| Rio Tinto Energy America – Bob Green | W | C114 | 100-5, 100-76, 308-2 |
| Roberts, Carol | P | C216 | 100-14, 200-9, 300-4, 603-1, 1500-2 |
| Roberts, Julia B. | P | C230 | 200-9, 300-4, 600-3, 603-1, 1500-2 |
| Robinson, Owen | O | C115 | 100-5, 307-4, 1600-6, 1600-11, 1600-12 |
| Rockafellow, Rachel | W, P | C116 | 100-7, 200-9, 300-4, 603-1, 1500-2 |
| Rogers, Bill | O | C117 | 100-77, 100-78 |
| Rose, Alison | W, P | C252 | 100-19, 200-9, 300-4, 603-1, 1500-2 |
| Russell, Merilee | O | C118 | 100-39, 100-79, 200-27, 602-17 |
| Russette, Tashina | W | C207 | 100-14, 100-19, 1700-2 |
| Scharf, Darrell | W | C211 | 100-5, 603-3 |
| Schinttgen, Michael | W | C276 | 100-13 |
| St. Pierre, Nate | O | C119 | 100-19, 100-48, 100-80, 1000-14 |
| Sands, Jim | O | C120 | 100-5, 100-81 |
| Savinski, Mark T. | P | C241 | 200-9, 300-4, 603-1, 1500-2 |
| Schaub, David L. | W | C121 | 100-14, 300-4, 301-4 |
| Schroeder, Arthur H. and Elizabeth | W | C273 | 600-1 |
| Sentz, Gene | W | C122 | 100-19, 301-1, 603-4, 604-1, 1500-2 |
| Setter, Marion J. | P | C212 | 200-9, 300-4, 603-1, 1500-2 |
| Shaw, Suzanne L. | W | C174 | 100-17, 100-19, 603-2, 1400-2 |
| Sherman, Roger | W | C123 | 100-14, 100-19, 200-4, 300-4, 602-1 |
| Shores, Karen C. | P | C246 | 200-9, 300-4, 303-1, 603-1, 1500-2 |
| Sicotte, Patricia C. | P | C219 | 200-9, 300-4, 603-1, 1500-2 |
| Siebel, gonnie | W | C124 | 100-20, 100-82, 200-4, 300-3, 300-4 |
| Simmons, William J. | W | C249 | 100-16 |
| Skari, Arlo | W, O | C125 | 100-48, 200-16, 200-22, 300-4, 500-3, 602-1, 602-7, 603-1, 603-10, 603-14 |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| Smith, Jennifer and Scott Friskics | W | C126 | 100-83, 200-16, 200-22, 300-1, 603-2 |
| Smith, Jude | W | C250 | 100-7, 100-14, 100-19, 300-2 |
| Smith, Steve C. | W | C127 | 100-82, 100-84, 300-18, 303-17, 305-7 |
| Snow, Don | P | C244 | 200-9, 300-4, 603-1, 1500-2 |
| Southern Montana Electric – Tim Gregori | W, O | C128 | 100-39, 100-85, 100-86, 100-87, 200-28, 200-29, 305-9, 305-15, 309-8, 310-1, 310-1, 400-5, 500-22, 500-23, 500-24, 600-15, 600-16, 600-17, 600-18, 600-19, 600-20, 601-1, 601-7, 601-12, 601-13, 602-1, 602-18, 602-19, 602-20, 602-21, 602-22, 602-23, 602-24, 602-25, 602-26, 602-27, 602-28, 602-29, 602-30, 603-15, 603-16, 603-17, 604-3, 604-4, 604-5, 700-6, 700-7, 700-8, 700-9, 700-10, 700-11, 700-12, 700-13, 800-6, 800-7, 800-8, 900-3, 1000-15, 1000-16, 1000-17, 1100-5, 1200-17, 1200-18, 1200-19, 1300-5, 1300-6, 1400-9, 1400-10, 1400-11, 1400-12, 1500-7, 1800-6, 1800-7 |
| Spencer, Dan | O | C129 | 100-19, 100-88, 301-1, 306-3, 601-11 |
| Spoja, William A., Jr. | W, O | C130 | 100-5, 100-36, 100-89, 100-90, 300-14, 307-4 |
| Stanley Consultants – Ray Walters | O | C131 | 305-9, 305-16 |
| Starshine | W, O | C132 | 100-19, 100-91, 305-4, 1600-5 |
| State Conference of Electrical Workers – Dan Flynn | O | C133 | 100-92 |
| Stenz, Robert W. | P | C225 | 200-9, 300-4, 603-1, 1500-2 |
| Stephens, Paul | W, O | C134 | 100-7, 100-25, 100-42, 100-50, 100-59, 100-60, 100-61, 100-93, 100-94, 100-95, 200-4, 200-5, 200-22, 200-23, 200-24, 200-25, 300-2, 300-3, 300-4, 305-17, 500-3, 600-10, 600-14, 602-1, 602-2, 602-5, 602-7, 602-12, 602-13, 602-14, 602-15, 603-1, 603-2, 603-4, 603-6, 603-7, 603-13, 1600-1, 1600-9, 1600-10, 1600-13, 1800-4 |
| Stevens, Bob Jr. | P | C226 | 200-9, 300-4, 603-1, 1500-2 |
| St. Pierre, Shana | W | C184 | 1700-5 |
| Stranahan, Lorene A. | W | C325 | 100-19, 300-1, 500-3, 500-5, 601-1 |
| Stump, Rainbow | W | C185 | 1700-2 |
| Sunchild, Deidra Rose | W | C189 | 100-19, 1700-2, 1700-5 |
| Swan, Margaret | W | C191 | 100-19, 1700-5 |

| Name | Type of Comments* | ID# | Comment Codes |
|--|-------------------|------|--|
| Swearingen, Jennifer | W | C135 | 100-20, 100-95, 200-4, 300-1, 300-4, 305-7, 602-2, 602-5 |
| Sweet, Bill | W | C309 | 100-19, 100-41, 603-1 |
| Sylvan Learning Center – Kendall May | W | C170 | 100-14, 100-19, 602-1, 602-5, 1500-2, 1700-1 |
| Taylor, Neil | O | C136 | 100-19 |
| Thackeray, William | W | C251 | 309-10 |
| Thompson, Erin | W | C137 | 100-82, 601-2, 1500-2, 1500-8 |
| Thornton, Karen | W | C172 | 603-1 |
| Thornton, Ken | O | C138 | 603-7 |
| Thornton, Millie | W | C169 | 300-1, 601-2, 1500-9 |
| Tighe, Dennis | W | C303 | 100-16, 200-5, 300-2, 601-2 |
| Toldness, Marie Ann, Loren A., and Rachel J. | W | C287 | 100-13, 100-14, 303-1, 603-1, 1500-2 |
| Tongue River Electric Cooperative – Keith Bales | O | C139 | 100-5, 100-36, 100-96, 200-30, 305-9, 305-16, 602-6, 1600-12 |
| Tongue River Electric Cooperative – Diana McLean | O | C140 | 200-3, 1700-4 |
| Tongue River Electric Cooperative – Diane Rapos | O | C141 | 100-5, 600-1 |
| Tongue River Electric Cooperative – Alan See | O | C142 | 308-16 |
| Torske, Jim | O | C143 | 100-5, 200-31 |
| Tourangeau, Pat and Nick | W | C258 | 100-19, 603-1 |
| Town of Geraldine – Mayor Holly Ebeling | W | C316 | 100-98, 300-1 |
| Travis, Lee | W | C330 | 100-19, 200-9, 300-4, 602-1, 603-1, 1500-2 |
| Turner, Gayle | W | C145 | 600-1 |
| Tuss, Elsie | C | C307 | 602-3, 602-4 |
| Urquhart, Duane | W | C271 | 100-1, 100-5, 1600-1 |
| Urquhart, Mary | W | C270 | 100-1, 100-5, 1600-11 |
| Vincent, Chris (Mary C.) | W | C146 | 100-48, 600-3, 603-1 |
| Vincent, Clay | O | C147 | 100-48, 100-97, 302-5, 305-1 |
| Walsh, Portland | W | C195 | 100-19, 1700-2 |
| Warner, David | O | C148 | 100-5, 300-15, 1600-12 |
| Weaver, Noel | W | C149 | 100-97, 200-32 |
| Weber, Cindy | O | C150 | 100-98, 1600-1 |
| Wendt, Doug | O | C151 | 100-16, 100-24, 100-42, 200-15, 200-16, 603-1 |
| Wheeler, Myron C. | W | C323 | 100-5, 100-36 |
| Williams, Jeff | W | C285 | 200-9, 300-4, 603-1, 1500-2 |

| Name | Type of Comments* | ID# | Comment Codes |
|---|-------------------|------|---|
| Williams, Wendy | P | C237 | 200-9, 300-4, 603-1, 1500-2 |
| Willison, Jeannine | W | C333 | 100-19, 100-24, 200-4, 300-1, 500-3 |
| Wilson-Pant, M. Calanthe | W | C152 | 308-17, 309-9, 1000-19, 1100-6 |
| Windy Boy, Nathaniel | W | C186 | 100-19, 300-1, 1700-5 |
| Witsoe, Michael | O | C153 | 300-16, 304-1 |
| Women's Voices for the Earth – Alexandra Gorman | W | C154 | 601-2, 602-1, 1500-2 |
| Wood, Wilbur | W | C155 | 100-19, 301-1, 303-10, 303-18, 500-3, 600-3 |
| Yellowstone Valley Electric Cooperative – Irwin Elleson | O | C156 | 600-1 |
| Yellowstone Valley Electric Cooperative – Terry Holzer | O | C157 | 200-33 |
| Yellowstone Valley Electric Cooperative – Larry Kaufman | O | C158 | 100-5, 300-17 |
| Yellowstone Valley Electric Cooperative – Dave Kelsey | O | C159 | 200-3, 301-5, 302-6, 500-14, 500-15, 602-1, 1400-13 |
| Yellowstone Valley Electric Cooperative – Dick Weldon | O | C160 | 200-3 |
| Yellowstone Valley Electric Cooperative – Brandon Wittman | O | C161 | 100-5, 100-36, 1700-4 |
| Young, Brue A. | P | C229 | 200-9, 300-4, 603-1, 1500-2 |

* W – Written comment (email, attached electronic file, hard copy letter, etc.); P – postcard; O – Oral testimony at public hearing in Great Falls or Havre

Table L-5. List of Commenters and their Comments in Numerical Order

| ID# | Name | Type of Comments* | Comment Codes |
|-----|---|-------------------|---|
| C1 | Allaire, Robin | O | 300-1, 600-1, 602-1, 603-1 |
| C2 | Anderson, David | W, O | 100-1, 308-2 |
| C3 | Anderson, Sharon | W | 100-2, 100-3, 100-4, 602-1 |
| C4 | Baiz, Claire | O | 300-1, 303-1, 305-1, 603-1, 603-2, 1600-1 |
| C5 | Ball-Giep, Debbie | O | 100-5, 303-2, 304-1, 308-2 |
| C6 | Beartooth Electric Cooperative, Carbon County Commission – John Prinkki | O | 308-2, 603-3 |
| C7 | Beartooth Electric Cooperative – Bob Walker | O | 200-1, 200-2, 200-3 |
| C8 | Becker, Julia | W | 100-3, 100-6, 100-7, 100-8, 100-9, 100- |

| ID# | Name | Type of Comments* | Comment Codes |
|-----|--|-------------------|--|
| | | | 10, 200-4, 300-1, 300-2, 300-3, 302-1, 305-1, 305-2, 307-1, 307-2, 308-3, 308-4, 500-1, 500-2, 500-3, 600-2, 600-3, 600-21, 603-4, 604-1, 700-1, 800-1, 900-1, 1000-1, 1300-1, 1400-1, 1400-2, 1600-1, 1600-2, 1600-3, 1700-1, 1700-2 |
| C9 | Bernard, Joanne | O | 300-2, 306-1, 307-1, 700-1, 1200-1 |
| C10 | Biehl, Daniel S. | W | 100-11, 100-12, 200-5, 200-6, 301-1, 303-3, 303-4, 307-1, 602-31, 603-5, 700-2, 1500-2 |
| C11 | Bison Engineering – Jeff Chaffee | O | 601-1, 1500-1 |
| C12 | Bjornlie, Harvey C. | W | 200-5, 200-7, 305-2, 603-1 |
| C13 | Bjornlie, Sheila | W | 100-14, 100-15, 304-1 |
| C14 | Bocock, Charles | W, O | 100-16, 100-17, 200-8, 500-2, 500-4, 602-1, 602-2, 602-3, 1000-2, 1300-2, 1400-1, 1400-3, 1400-4, 1400-5 |
| C15 | Boysun, Randal J. | W, O | 100-5, 100-18 |
| C16 | Bradley, Patricia | W | 100-14, 100-19, 200-4 |
| C17 | Carrick, Patricia | W | 100-14, 100-20, 200-9, 300-4, 601-2, 1500-2 |
| C18 | Chippewa Cree Tribal Council, Montana Legislature – Jonathan Windy Boy | O | 100-15, 100-21, 600-4, 1400-1 |
| C19 | City of Great Falls – Donna Stebbins | O | 308-2, 602-1 |
| C20 | Citizens for Clean Energy – Cheryl M. Reichert | W | 100-15, 100-17, 100-19, 100-22, 100-23, 100-24, 100-25, 200-4, 200-10, 200-11, 200-12, 200-13, 200-14, 200-15, 200-16, 303-4, 305-2, 305-3, 305-4, 307-1, 308-5, 309-1, 500-3, 601-2, 602-1, 602-3, 602-4, 602-5, 603-1, 603-2, 603-6, 604-1, 700-1, 900-1, 1000-2, 1100-1, 1200-1, 1400-1, 1600-1, 1600-2, 1700-1, 1700-2 |
| C21 | City of Great Falls – John Lawton | O | 200-17 |
| C22 | City of Great Falls – Jordan Love | O | 100-26 |
| C23 | Clean Air Task Force – John W. Thompson | W | 300-2, 305-1, 305-2, 305-5, 305-6, 305-7 |
| C24 | Collins, Carol | O | 100-27, 303-1, 305-6, 305-7, 307-1, 600-3, 1600-1 |
| C25 | Crete, Ronald A. | W | 100-28, 300-2, 300-5, 305-2, 307-1, 603-4 |

| ID# | Name | Type of Comments* | Comment Codes |
|-----|---|-------------------|--|
| C26 | DayChild, Henry, Sr. | O | 200-15, 300-1, 600-4 |
| C27 | Deligdisch, Andree | O | 100-29, 303-5, 500-5, 600-3 |
| C28 | Department of the Interior (U.S.) – Robert F. Stewart | W | 500-6, 500-7, 500-8, 500-9, 600-5, 800-2, 1000-3, 1000-4, 1000-5, 1000-6, 1000-18, 1100-2, 1100-3 |
| C29 | Dolman, Aart | W, O | 100-7, 100-14, 100-30, 100-31, 302-2, 303-6, 600-3, 602-6, 1000-7, 1000-8, 1000-9, 1400-1, 1400-6 |
| C30 | Dopler, Pat | W | 200-5, 301-6, 302-3, 303-7, 603-7 |
| C31 | Downs, Dan | O | 100-32, 300-6, 303-2 |
| C32 | Durham, Margery | W | 303-8, 308-4, 1600-4 |
| C33 | Eckenstein, Vicki | W | 308-7, 600-6, 601-3, 603-4, 604-1, 1600-5 |
| C34 | Electric City Power, Inc. – Coleen Balzarini | W, O | 200-17, 200-18 |
| C35 | Emerson, Jim | W | 100-14, 100-24, 500-3, 603-1 |
| C36 | Environmental Protection Agency (U.S.), Region 8 – John Wardell | W | 100-33, 100-34, 303-19, 305-2, 305-8, 306-1, 306-2, 308-8, 400-1, 500-2, 500-5, 500-10, 500-11, 500-12, 500-13, 600-7, 601-4, 601-5, 601-6, 601-7, 601-8, 602-7, 603-8, 603-9, 604-2, 700-3, 700-4, 700-5, 1000-10, 1200-3 |
| C37 | Evans, Allen | O | 100-5, 100-35 |
| C38 | Federspiel, Laura | O | 100-14, 600-3, 1500-2, 1600-6 |
| C39 | Fergus Electric Cooperative – David Dover | O | 100-36, 200-3 |
| C40 | Fergus Electric Cooperative – Robert Evans | O | 200-3 |
| C41 | Fergus Electric Cooperative – Joe Dirkson | W, O | 100-1, 100-5, 100-36, 600-22 |
| C42 | Fergus Electric Cooperative – Guy Johnson | O | 100-5, 200-3, 200-19 |
| C43 | Fergus Electric Cooperative – Joe Pirrie | O | 100-35, 303-2 |
| C44 | Fergus Electric Cooperative – Scott Sweeney | W, O | 100-18, 100-36, 305-9, 600-1 |
| C45 | Floyd, Jaybe | W | 300-2, 300-3, 303-3, 306-1, 800-3, 1600-1 |
| C46 | Fraser, Scott | W | 100-14, 100-37, 300-2 |
| C47 | Freyholtz, Mert | O | 308-9, 600-8 |
| C48 | Freyholtz, Vicki | O | 100-14, 100-38, 100-39, 300-3, 306-3, 602-8, 603-1, 603-2 |
| C49 | Gallagher, George | O | 100-5 |

| ID# | Name | Type of Comments* | Comment Codes |
|-----|---|-------------------|--|
| C50 | Gessaman, Kathleen Z. | W | 100-15, 200-4, 301-1, 302-4, 307-1, 307-3, 308-4, 601-2, 601-3, 601-9, 601-10, 602-1, 602-9, 1000-11, 1800-1 |
| C51 | Grant, Charles | O | 100-40, 300-4, 1500-3 |
| C52 | Gray, Randy | O | 100-36, 200-3, 305-9 |
| C53 | Hamlett, Brad | O | 100-5, 500-14, 600-9 |
| C54 | Hankins, Lester (Butch) | W, O | 100-14, 100-19, 100-23, 100-41, 200-8, 1500-2 |
| C55 | Hanson, Victor H. | W | 100-41, 500-3 |
| C56 | Haug, Catherine | W | 100-14, 100-20, 200-4, 1500-2 |
| C57 | Helm, Gary | O | 100-36, 200-3, 307-4, 600-4 |
| C58 | Henderson, Janet | W | 100-14, 100-16, 300-2, 303-9, 307-1, 500-3, 1000-1 |
| C59 | Hilden, Alan D. | W | 100-14, 200-5, 300-4 |
| C60 | Hines, Jessica | W | 100-19, 308-3, 601-2 |
| C61 | Hoy, Mike | W | 100-20, 200-9, 300-4, 308-10, 603-1, 1500-2 |
| C62 | Hubbard, John | O | 100-42, 1500-2 |
| C63 | Humphrey, Lucretia | W | 100-19, 300-2, 303-1, 1500-2 |
| C64 | Hyndman, Donald W. | W | 300-5, 300-8, 305-3, 603-1, 603-2 |
| C65 | International Electrical Workers 33 – Curtis Sweet | O | 603-10 |
| C66 | International Union of Operation Engineers, Local 400 – Earl Salley | O | 100-5 |
| C67 | Johnson, E.A. | W | 100-5, 100-36 |
| C68 | Jolley, Mary | O | 100-7, 305-6, 305-10, 900-1 |
| C69 | Jones, Cedron | W | 100-19, 100-43, 302-4 |
| C70 | Kaufmann, Christine | W | 100-20, 603-2 |
| C71 | Kendy, Eloise | W | 100-44, 500-3, 500-5, 500-16, 500-17 |
| C72 | Kent, Paul and Vicki | W | 100-14, 100-19, 200-4 |
| C73 | Klingman, Vern; Russ Doty, Tom Towe | W | 300-3, 305-1, 305-6, 305-11 |
| C74 | Kralj, Larry | O | 100-14, 601-2, 1600-1 |
| C75 | LaCassee, Craig | O | 603-1, 603-4 |
| C76 | Lassila, Bob | O | 307-1, 308-10 |
| C77 | Lewin, Hilary | O | 100-3, 100-23, 100-45, 100-46, 100-47, 100-48, 200-26, 300-2, 305-2, 307-5, 603-2 |
| C78 | Lewin, Stuart | W, O | 100-7, 100-17, 100-19, 100-49, 100-50, 300-2, 300-3, 300-10, 304-1, 305-2, 400-2, 400-3, 600-10, 600-11, 600-12, 600-13, 601-3, 602-1, 602-4, 602-6, 602-10, |

| ID# | Name | Type of Comments* | Comment Codes |
|-----|--|-------------------|--|
| | | | 603-2, 604-1, 1300-1, 1600-1, 1800-2 |
| C79 | Lewis and Clark Interpretive Center Foundation – Debbie M. Churchill | W | 1000-12 |
| C80 | Liebert, Richard | W, O | 100-28, 100-51, 100-52, 100-53, 100-54, 100-55, 100-56, 300-2, 300-4, 300-11, 301-2, 302-4, 303-8, 303-10, 303-11, 303-12, 303-13, 303-14, 303-15, 303-16, 303-17, 304-1, 305-3, 305-6, 305-10, 305-12, 305-13, 305-14, 306-2, 306-4, 307-6, 308-11, 308-12, 308-13, 308-14, 309-2, 309-3, 309-4, 309-5, 309-6, 309-7, 400-4, 500-2, 500-10, 500-18, 500-19, 602-3, 602-4, 602-11, 603-1, 603-2, 603-6, 603-9, 603-11, 604-1, 800-4, 800-5, 900-1, 900-2, 1000-2, 1000-4, 1000-13, 1000-18, 1100-4, 1200-1, 1300-3, 1300-4, 1400-7, 1500-4, 1500-5, 1600-1, 1600-7, 1600-8, 1700-3, 1800-3 |
| C81 | Lindlief-Hall, Brenda | W | 100-20, 300-2, 601-2, 603-1, 1700-1 |
| C82 | Longhart, Fred L. | W | 100-19, 300-1, 303-1, 603-1 |
| C83 | Malsam, Russ | O | 100-5, 100-57, 100-58 |
| C84 | Mathsen, Ronald | O | 100-16, 100-19, 100-45, 303-1, 305-2, 603-5, 603-6, 603-7, 603-12 |
| C85 | McDougal, Susanna | W | 200-9, 300-4, 303-1, 1500-2 |
| C86 | McLaughlin, William C. | W | 100-14, 100-19, 200-4, 200-5 |
| C87 | Mercer, Colleen | W | 200-9, 300-1, 304-1, 600-3, 602-1, 603-1, 1500-2 |
| C88 | Meyer, Curt | W | 100-14, 300-1, 305-1, 603-1, 603-4 |
| C89 | Mid-Yellowstone Electric Cooperative – Ted Church | W, O | 200-21 |
| C90 | Mid-Yellowstone Electric Cooperative – William Fitzgerald | O | 100-1, 100-59 |
| C91 | Mid-Yellowstone Electric Cooperative – Judi Knapp | W | 100-1, 100-36, 100-59 |
| C92 | Mid-Yellowstone Electric Cooperative – Larry Williams | W | 100-1, 100-36, 100-59 |
| C93 | Montana Coal Council – Bud Clinch | O | 100-36, 600-1 |
| C94 | Montana Department of Transportation – Jim Skinner | W | 1200-4, 1200-5, 1200-6, 1200-7, 1200-8, 1200-9, 1200-10, 1200-11, 1200-12, 1200-13, 1200-14, 1200-15, 1200-16 |
| C95 | Montana Environmental | W, O | 100-50, 100-59, 100-60, 100-61, 200-4, |

| ID# | Name | Type of Comments* | Comment Codes |
|------|--|-------------------|---|
| | Information Center – Pat Judge and Anne Hedges | | 200-5, 200-22, 200-23, 200-24, 200-25, 300-2, 300-3, 300-4, 500-3, 600-10, 600-14, 602-1, 602-2, 602-5, 602-7, 602-12, 602-13, 602-14, 602-15, 603-1, 603-2, 603-4, 603-6, 603-7, 603-13, 1600-9, 1600-10, 1800-4 |
| C96 | Montana Environmental Trade Association – Don Allen | O | 100-5, 100-36, 100-62, 300-12 |
| C97 | Montana Preservation Alliance – Chere Jiusto | W | 1000-4, 1000-18 |
| C98 | Moore, John | W | 307-1, 308-4 |
| C99 | Morris, Pamela | O | 301-3, 602-1, 604-1 |
| C100 | Murri, Val & Karen | W | 100-19, 100-63, 600-14 |
| C101 | National Trust for Historic Preservation – Amy Cole | W | 1000-18 |
| C102 | Norgaard, Roger | O | 100-19, 700-1 |
| C103 | North Central Montana Building and Construction Trades – Duane Mellinger | O | 100-5, 100-64, 603-3 |
| C104 | Northern Plains Resource Council – Mark Fix | W | 100-28, 100-65, 100-66, 300-9, 303-1, 304-1, 500-3, 500-20, 603-1, 603-5, 603-10, 1400-8, 1800-5 |
| C105 | Papoulis, Mary | W, O | 100-16, 100-67, 100-68, 200-22, 200-26, 301-1, 305-2, 603-5, 1000-18 |
| C106 | Pfister, Ellen | W | 100-69, 300-1, 300-4, 301-1, 1600-9 |
| C107 | Plumbers and Pipe Fitters, Local 41 – Olaf Stimac | W, O | 100-70 |
| C108 | Poremba, Maureen | W | 200-9, 300-4, 603-1, 1500-2 |
| C109 | Putzker, Rob & Joanne | W | 100-71 |
| C110 | Quinn, Bob | O | 300-13, 303-7, 303-10, 305-2, 600-4, 602-16, 1300-1 |
| C111 | Ransdell, Hilary | W | 100-15, 100-17, 100-19, 100-45, 100-72, 100-73, 200-16, 300-2, 307-7, 601-11, 602-15, 1600-1 |
| C112 | Rezeates, Larry | O | 100-19, 100-74, 100-75, 1500-6 |
| C113 | Richter, Cindy | W | 300-4, 308-4 |
| C114 | Rio Tinto Energy America – Bob Green | W | 100-5, 100-76, 308-2 |
| C115 | Robinson, Owen | O | 100-5, 307-4, 1600-6, 1600-11, 1600-12 |
| C116 | Rockafellow, Rachel | W, P | 100-7, 200-9, 300-4, 603-1, 1500-2 |
| C117 | Rogers, Bill | O | 100-77, 100-78 |
| C118 | Russell, Merilee | O | 100-39, 100-79, 200-27, 602-17 |
| C119 | St. Pierre, Nate | O | 100-19, 100-48, 100-80, 1000-14 |

| ID# | Name | Type of Comments* | Comment Codes |
|------|--|-------------------|--|
| C120 | Sands, Jim | O | 100-5, 100-81 |
| C121 | Schaub, David L. | W | 100-14, 300-4, 301-4 |
| C122 | Sentz, Gene | W | 100-19, 301-1, 603-4, 604-1, 1500-2 |
| C123 | Sherman, Roger | W | 100-14, 100-19, 200-4, 300-4, 602-1 |
| C124 | Siebel, gonnie | W | 100-20, 100-82, 200-4, 300-3, 300-4 |
| C125 | Skari, Arlo | W, O | 100-48, 200-16, 200-22, 300-4, 500-3, 602-1, 602-7, 603-1, 603-10, 603-14 |
| C126 | Smith, Jennifer and Scott Friskics | W | 100-83, 200-16, 200-22, 300-1, 603-2 |
| C127 | Smith, Steve C. | W | 100-82, 100-84, 300-18, 303-17, 305-7 |
| C128 | Southern Montana Electric – Tim Gregori | W, O | 100-39, 100-85, 100-86, 100-87, 200-28, 200-29, 305-9, 305-15, 309-8, 310-1, 310-1, 400-5, 500-22, 500-23, 500-24, 600-15, 600-16, 600-17, 600-18, 600-19, 600-20, 601-1, 601-7, 601-12, 601-13, 602-1, 602-18, 602-19, 602-20, 602-21, 602-22, 602-23, 602-24, 602-25, 602-26, 602-27, 602-28, 602-29, 602-30, 603-15, 603-16, 603-17, 604-3, 604-4, 604-5, 700-6, 700-7, 700-8, 700-9, 700-10, 700-11, 700-12, 700-13, 800-6, 800-7, 800-8, 900-3, 1000-15, 1000-16, 1000-17, 1100-5, 1200-17, 1200-18, 1200-19, 1300-5, 1300-6, 1400-9, 1400-10, 1400-11, 1400-12, 1500-7, 1800-6, 1800-7 |
| C129 | Spencer, Dan | O | 100-19, 100-88, 301-1, 306-3, 601-11 |
| C130 | Spoja, William A., Jr. | W, O | 100-5, 100-36, 100-89, 100-90, 300-14, 307-4 |
| C131 | Stanley Consultants – Ray Walters | O | 305-9, 305-16 |
| C132 | Starshine | W, O | 100-19, 100-91, 305-4, 1600-5 |
| C133 | State Conference of Electrical Workers – Dan Flynn | O | 100-92 |
| C134 | Stephens, Paul | W, O | 100-7, 100-25, 100-42, 100-50, 100-59, 100-60, 100-61, 100-93, 100-94, 100-95, 200-4, 200-5, 200-22, 200-23, 200-24, 200-25, 300-2, 300-3, 300-4, 305-17, 500-3, 600-10, 600-14, 602-1, 602-2, 602-5, 602-7, 602-12, 602-13, 602-14, 602-15, 603-1, 603-2, 603-4, 603-6, 603-7, 603-13, 1600-1, 1600-9, 1600-10, 1600-13, 1800-4 |
| C135 | Swearingen, Jennifer | W | 100-20, 100-95, 200-4, 300-1, 300-4, 305-7, 602-2, 602-5 |
| C136 | Taylor, Neil | O | 100-19 |

| ID# | Name | Type of Comments* | Comment Codes |
|------|---|-------------------|--|
| C137 | Thompson, Erin | W | 100-82, 601-2, 1500-2, 1500-8 |
| C138 | Thornton, Ken | O | 603-7 |
| C139 | Tongue River Electric Cooperative – Keith Bales | O | 100-5, 100-36, 100-96, 200-30, 305-9, 305-16, 602-6, 1600-12 |
| C140 | Tongue River Electric Cooperative – Diana McLean | O | 200-3, 1700-4 |
| C141 | Tongue River Electric Cooperative – Diane Rapos | O | 100-5, 600-1 |
| C142 | Tongue River Electric Cooperative – Alan See | O | 308-16 |
| C143 | Torske, Jim | O | 100-5, 200-31 |
| C144 | Lewis and Clark Trail Heritage Foundation – Wendy Raney | W | 1000-18 |
| C145 | Turner, Gayle | W | 600-1 |
| C146 | Vincent, Chris (Mary C.) | W | 100-48, 600-3, 603-1 |
| C147 | Vincent, Clay | O | 100-48, 100-97, 302-5, 305-1 |
| C148 | Warner, David | O | 100-5, 300-15, 1600-12 |
| C149 | Weaver, Noel | W | 100-97, 200-32 |
| C150 | Weber, Cindy | O | 100-98, 1600-1 |
| C151 | Wendt, Doug | O | 100-16, 100-24, 100-42, 200-15, 200-16, 603-1 |
| C152 | Wilson-Pant, M. Calanthe | W | 308-17, 309-9, 1000-19, 1100-6 |
| C153 | Witsoe, Michael | O | 300-16, 304-1 |
| C154 | Women’s Voices for the Earth – Alexandra Gorman | W | 601-2, 602-1, 1500-2 |
| C155 | Wood, Wilbur | W | 100-19, 301-1, 303-10, 303-18, 500-3, 600-3 |
| C156 | Yellowstone Valley Electric Cooperative – Irwin Elleson | O | 600-1 |
| C157 | Yellowstone Valley Electric Cooperative – Terry Holzer | O | 200-33 |
| C158 | Yellowstone Valley Electric Cooperative – Larry Kaufman | O | 100-5, 300-17 |
| C159 | Yellowstone Valley Electric Cooperative – Dave Kelsey | O | 200-3, 301-5, 302-6, 500-14, 500-15, 602-1, 1400-13 |
| C160 | Yellowstone Valley Electric Cooperative – Dick Weldon | O | 200-3 |
| C161 | Yellowstone Valley Electric Cooperative – Brandon Wittman | O | 100-5, 100-36, 1700-4 |
| C162 | Blaine County Farmers Union – Barb Hauge | W | 100-19 |
| C163 | Hari, Robert | W | 100-5, 100-37 |

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|------|--|-------------------|---|
| C164 | Good, Mark | W | 200-5, 303-3, 602-1, 603-1, 603-2, 603-6 |
| C165 | Hardiman, Lisa Lotte | W | 100-3, 200-5, 305-3, 500-3, 600-3, 602-1, 700-1 |
| C166 | Bennett, Dan | W | 300-2, 300-4 |
| C167 | Fisher, Joanne | W | 100-16, 600-3, 603-2, 1500-2, 1700-1 |
| C168 | Fisher, Richard | W | 100-14, 100-16, 300-3, 1500-2, 1700-1 |
| C169 | Thornton, Millie | W | 300-1, 601-2, 1500-9 |
| C170 | Sylvan Learning Center – Kendall May | W | 100-14, 100-19, 602-1, 602-5, 1500-2, 1700-1 |
| C171 | Hemstad, Phyllis | W | 100-19, 100-49, 307-1 |
| C172 | Thornton, Karen | W | 603-1 |
| C173 | Makich, Max A. | W | 100-19 |
| C174 | Shaw, Suzanne L. | W | 100-17, 100-19, 603-2, 1400-2 |
| C175 | Meissner, Mary | W | 100-19, 500-3, 600-1 |
| C176 | Carman, Denita | W | 602-1, 602-5 |
| C177 | Portage Route Chapter, Lewis & Clark Trail Heritage Foundation – Willard R. Weaver | W | 1000-12 |
| C178 | Montana Electric Cooperatives' Association – Gary Wiens | W | 200-3, 305-9 |
| C179 | Horn, Claud A. and Brenda | W | 100-14, 100-19, 303-1, 600-1 |
| C180 | City of Great Falls/Cascade Co. Historic Preservation Office – Ellen Sievert and Ken Robison | W | 1000-12 |
| C181 | Federal Aviation Administration – Clark Desing | W | 1200-19 |
| C182 | Little Shell Chippewa Tribe – James Parker Shield | W | 1000-20 |
| C183 | Denny, Aldean | W | 1700-5 |
| C184 | St. Pierre, Shana | W | 1700-5 |
| C185 | Stump, Rainbow | W | 1700-2 |
| C186 | Windy Boy, Nathaniel | W | 100-19, 300-1, 1700-5 |
| C187 | Piapot, Cheenah | W | 100-76, 602-5, 1700-5 |
| C188 | Murphy, Robert A. | W | 100-19, 1700-5 |
| C189 | Sunchild, Deidra Rose | W | 100-19, 1700-2, 1700-5 |
| C190 | Ackerman, Terri | W | 100-19, 604-1, 1700-5 |
| C191 | Swan, Margaret | W | 100-19, 1700-5 |
| C192 | Eagleman, Ira | W | 100-19, 1700-2 |
| C193 | Ragged Robe, Wabusk | W | 100-19, 602-1, 1700-2 |
| C194 | Baker, Mallory | W | 100-4, 100-19, 300-1, 602-1 |
| C195 | Walsh, Portland | W | 100-19, 1700-2 |
| C196 | Azure, Vickie J. | W | 100-19, 1700-5 |

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|------|---------------------------|-------------------|--|
| C197 | Raining Bird, Brandon | W | 1500-2 |
| C198 | Gardipee, Kenneth | W | 100-19, 1700-2, 1700-5 |
| C199 | Blane, Monica J. | W | 100-19, 1500-2 |
| C200 | Arca, Ronni | W | 602-5 |
| C201 | Cabigas, Leah | W | 602-5, 1700-2, 1700-5 |
| C202 | Morrow, Roberta | W | 100-19, 1500-2, 1700-5 |
| C203 | Duran, Willdette M. | W | 602-5 |
| C204 | Little, Gloria | W | 100-19, 300-2, 602-5, 603-1, 1500-2 |
| C205 | Horton, Daniel P. | W | 100-19, 300-19, 302-4, 304-1 |
| C206 | Alvarez, Abel | W | 100-19, 602-1, 602-5 |
| C207 | Russette, Tashina | W | 100-14, 100-19, 1700-2 |
| C208 | Meyers, Nathan | W | 100-4, 1600-1 |
| C209 | Meyer, Rolane | P | 200-9, 300-4, 603-1, 1500-2 |
| C210 | Blood, W.A. | P | 200-9, 300-4, 603-1, 1500-2 |
| C211 | Scharf, Darrell | W | 100-5, 603-3 |
| C212 | Setter, Marion J. | P | 200-9, 300-4, 603-1, 1500-2 |
| C213 | Decker, Eileen | P | 200-9, 300-4, 603-1, 1500-2 |
| C214 | Ellingsen, Valley | P | 200-9, 300-4, 603-1, 1500-2 |
| C215 | Baxter, Bruce | P | 200-9, 300-4, 603-1, 1500-2 |
| C216 | Roberts, Carol | P | 100-14, 200-9, 300-4, 603-1, 1500-2 |
| C217 | Gniadek, Steve | P | 200-9, 300-4, 603-1, 1500-2 |
| C218 | Dagenais, Phyllis | P | 200-9, 300-4, 603-1, 1500-2 |
| C219 | Sicotte, Patricia C. | P | 200-9, 300-4, 603-1, 1500-2 |
| C220 | Kingsland, Margaret C. | P | 200-9, 300-4, 603-1, 1500-2 |
| C221 | Richards, Paul | P | 200-9, 300-4, 603-1, 1500-2 |
| C222 | Plouzek, Morlene | P, W | 100-19, 200-9, 300-4, 603-1, 1500-2 |
| C223 | Morgan, Susan | P | 200-9, 300-4, 603-1, 1500-2 |
| C224 | Holmes, Krys | P | 200-9, 300-4, 603-1, 1500-2 |
| C225 | Stenz, Robert W. | P | 200-9, 300-4, 603-1, 1500-2 |
| C226 | Stevens, Bob Jr. | P | 200-9, 300-4, 603-1, 1500-2 |
| C227 | Deveny, Christine | P | 200-9, 300-4, 603-1, 1500-2 |
| C228 | Howe, Charles M. | P | 200-9, 300-4, 603-1, 1500-2 |
| C229 | Young, Brue A. | P | 200-9, 300-4, 603-1, 1500-2 |
| C230 | Roberts, Julia B. | P | 200-9, 300-4, 600-3, 603-1, 1500-2 |
| C231 | LaBuff, Lorna | P | 200-9, 300-4, 603-1, 1500-2 |
| C232 | Fredlund, Dale | P | 200-9, 300-4, 603-1, 1500-2 |
| C233 | Richardson, Gail and John | P | 100-14, 200-4, 200-9, 300-4, 603-1, 1500-2 |
| C235 | Mazzola, Donald | P | 200-9, 300-4, 603-1, 1500-2 |
| C236 | Bergstein, Diane | P | 100-14, 200-9, 300-4, 603-1, 1500-2 |
| C237 | Williams, Wendy | P | 200-9, 300-4, 603-1, 1500-2 |

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|------|--|-------------------|---------------------------------------|
| C238 | Redmond, Carmen D. | P | 200-9, 300-4, 603-1, 1500-2, 1800-8 |
| C239 | Hastings, Teresa | P | 200-9, 300-4, 500-3, 603-1, 1500-2 |
| C240 | Heffern, Roy | P | 200-9, 300-4, 303-1, 603-1, 1500-2 |
| C241 | Savinski, Mark T. | P | 200-9, 300-4, 603-1, 1500-2 |
| C242 | Larsen, David | P | 200-9, 300-4, 603-1, 1500-2 |
| C243 | Ferenstein, Jennifer | P | 200-9, 300-4, 603-1, 1500-2 |
| C244 | Snow, Don | P | 200-9, 300-4, 603-1, 1500-2 |
| C245 | Helvey, Patricia B. | P | 200-9, 300-4, 603-1, 1500-2 |
| C246 | Shores, Karen C. | P | 200-9, 300-4, 303-1, 603-1, 1500-2 |
| C247 | Rana, Paul J. | P | 200-9, 300-4, 600-1, 603-1, 1500-2 |
| C248 | Bell, James P. | W | 602-1, 603-1, 604-1, 1000-21, 1600-14 |
| C249 | Simmons, William J. | W | 100-16 |
| C250 | Smith, Jude | W | 100-7, 100-14, 100-19, 300-2 |
| C251 | Thackeray, William | W | 309-10 |
| C252 | Rose, Alison | W, P | 100-19, 200-9, 300-4, 603-1, 1500-2 |
| C253 | Armstrong, Stuart L. | P | 200-9, 300-4, 603-1, 1500-2 |
| C254 | Johnson, Jan | W | 100-4 |
| C255 | Dieruf, Bob | W | 100-4 |
| C256 | Dieruf, Carli | W | 100-4 |
| C257 | Crawford, Wayne and Ann | W | 100-19 |
| C258 | Tourangeau, Pat and Nick | W | 100-19, 603-1 |
| C259 | Dutchak, Nancy M. | W | 100-20, 305-1 |
| C260 | Miller, Donald | W | 603-3 |
| C261 | Makich, Kathleen O. | W | 100-19, 300-2 |
| C262 | Reichert, Arlyne | W | 100-15, 100-19, 300-3, 1000-2 |
| C263 | Henneford, Nancy M. | W | 100-14, 100-19, 300-1, 305-1 |
| C264 | Henneford, J. R. | W | 100-14, 300-1, 300-3, 305-1 |
| C265 | McBroom, Scott T. | W | 100-4, 300-1 |
| C266 | Mayernik, Stephen V. | W | 306-1, 307-1, 1300-1, 1400-1 |
| C267 | Boilermakers in Montana, Local 11 – Robert K. Winger | W | 100-1, 100-5, 1600-11 |
| C268 | Merasty, Robin T. | W | 100-19, 1700-5 |
| C269 | Armstrong, Henry L. | W | 100-40, 305-1, 1700-1 |
| C270 | Urquhart, Mary | W | 100-1, 100-5, 1600-11 |
| C271 | Urquhart, Duane | W | 100-1, 100-5, 1600-1 |
| C272 | Northern Cheyenne Tribe – Eugene Little Coyote | W | 100-19, 601-2, 602-1 |
| C273 | Schroeder, Arthur H. and Elizabeth | W | 600-1 |
| C274 | Albertson, Joyce | W | 100-19, 603-1, 1500-2 |
| C275 | Fergus Electric Cooperative – | W | 100-1, 1600-11 |

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|------|--|-------------------|--|
| | Leo Solf | | |
| C276 | Schinttgen, Michael | W | 100-13 |
| C277 | Chippewa Cree Business Committee | W | 100-19, 1700-2 |
| C278 | Breeden, Janet | P | 200-9, 300-4, 603-1, 1500-2 |
| C279 | Heffern, Jacquie | W | 100-4, 100-19, 1500-2 |
| C280 | Moos, Ted | W | 100-13, 100-14, 100-19 |
| C281 | Gibson, Susan | W | 100-15 |
| C282 | Peck, Kathryn E. Peck | P | 200-9, 300-4, 603-1, 1500-2 |
| C283 | Gupton, Liz | W | 100-19, 300-2, 301-1, 603-1 |
| C284 | Jennings, Gerry | W | 100-79, 300-3, 602-1, 603-1, 1600-1 |
| C285 | Williams, Jeff | W | 200-9, 300-4, 603-1, 1500-2 |
| C286 | O'Neill, Joanne E. | W | 200-9, 300-4, 603-1, 1500-2 |
| C287 | Toldness, Marie Ann, Loren A., and Rachel J. | W | 100-13, 100-14, 303-1, 603-1, 1500-2 |
| C288 | Gestring, Charles | W | 300-1, 603-1 |
| C289 | Fiers, Mary F. | W | 604-1 |
| C290 | Fiers, Thomas A. | W | 604-1 |
| C291 | Elden, Cari | W | 100-19, 303-1 |
| C292 | Engleson, Jerry L. | W | 100-13, 200-5, 900-1 |
| C293 | Henderson, Noel | W | 100-48 |
| C294 | Moe, Duane N. | W | 100-19, 200-5, 303-10, 602-4, 603-1, 603-2 |
| C295 | Burns, Tracy | W | 100-19, 200-9, 300-4, 603-1, 1500-2 |
| C296 | Dirkson, Pat | W | 200-3, 600-22 |
| C297 | Dakin, Bill and Sarah | W | 100-19, 100-82, 200-5, 303-1, 603-1 |
| C298 | Newman, Joe | W | 100-19, 603-1, 603-7 |
| C299 | Klobofski, Denis | W | 100-19, 305-7, 1500-2 |
| C301 | Jennings, Doris | W | 100-4, 100-19, 300-1 |
| C302 | Fisher, Carol | W | 100-14, 100-19, 100-16, 300-1, 500-3, 602-1 |
| C303 | Tighe, Dennis | W | 100-16, 200-5, 300-2, 601-2 |
| C304 | Foster, Maureen | W | 100-13, 100-19, 300-2 |
| C305 | Armstrong, Leila | W | 100-19, 200-9, 300-2, 600-1 |
| C306 | Montana House of Representatives – Rep. George Golie | W | 100-5, 100-6, 100-36, 200-3, 307-4, 500-14, 602-8, 1600-11 |
| C307 | Tuss, Elsie | C | 602-3, 602-4 |
| C308 | Dieruf, Lenore | W | 100-13, 100-19, 300-1 |
| C309 | Sweet, Bill | W | 100-19, 100-41, 603-1 |
| C310 | Kington, Jacquelyn | P | 200-9, 300-4, 603-1, 1500-2 |
| C311 | Anderson, Lynn | W | 100-19, 300-1 |

| ID# | Name | Type of Comments* | Comment Codes |
|------|---|-------------------|--|
| C312 | Montana Ecosystems Defense Council – Steve Kelly | W | 100-16, 100-41, 200-9, 300-4, 500-3, 603-1, 1500-2 |
| C313 | Palmer, Jeffrey C. | W | 100-14, 300-1 |
| C314 | Burgess, Cindy J. | W | 602-1, 603-1, 603-18 |
| C315 | City of Fort Benton – Mayor Richard D. Morris | W | 200-3, 300-1, 500-3, 603-1, 1500-1 |
| C316 | Town of Geraldine – Mayor Holly Ebeling | W | 100-98, 300-1 |
| C317 | Clark, Gerald R. | W | 300-2, 303-1, 603-2, 1001-2, 1200-2 |
| C318 | McRae, Douglas S. | W | 305-4, 500-3 |
| C319 | Gotshalk, Richard | W | 100-16, 200-9, 300-4, 600-1, 603-1, 1500-2 |
| C320 | Fort Belknap Indian Community – Julia Doney, President | W | 100-19, 100-28, 307-1, 602-2, 1700-2, 1700-6 |
| C321 | Rammer, William A. | W | 100-19, 601-2 |
| C322 | Click, C. J. | W | 100-19 |
| C323 | Wheeler, Myron C. | W | 100-5, 100-36 |
| C324 | Jussila, Neil R. | W | 100-5 |
| C325 | Stranahan, Lorene A. | W | 100-19, 300-1, 500-3, 500-5, 601-1 |
| C327 | James, W. Dudley | W | 100-7 |
| C328 | Golder, Nick | W | 100-19, 300-1 |
| C329 | City of Havre – Councilwoman Emily Mayer Lossing, Ward IV | W | 100-19, 300-1, 602-1 |
| C330 | Travis, Lee | W | 100-19, 200-9, 300-4, 602-1, 603-1, 1500-2 |
| C331 | Burgess, Bill | W | 100-16, 601-2, 602-1, 1500-2 |
| C332 | Dobyns, Kris | W | 100-48 |
| C333 | Willison, Jeannine | W | 100-19, 100-24, 200-4, 300-1, 500-3 |
| C334 | Enk, Michael | W | 100-13, 100-16, 200-9, 300-4, 500-3, 603-1 |
| C335 | Erickson, Pamela | W | 100-19, 600-1, 603-1 |
| C336 | Hansen, Laulette L. | W | 100-19, 100-48, 300-1 |

* W – Written comment (email, attached electronic file, hard copy letter, etc.); P – postcard; O – Oral testimony at public hearing in Great Falls or Havre

Comments and Responses

The following pages contain the comments and agencies' responses to comments, organized under headings listed in Table L-3 above. Comments are shown in italics. Responses appear in boldface print following the comments. In many instances, similar comments are grouped together and have one response.

GEN-100 GENERAL

1. *Member cooperatives of SME are fortunate to benefit from a new stable power source that will be built in Great Falls. C2*

The board of SME, which I'm the chairman of at this time, has made every effort to address all of the environmental issues and all other issues, so that we could have the best, latest technology and the lowest cost power we can give to you our people. C90

The completion of the Highwood Generating Station is vital to the cooperatives involved. C91

SME cooperatives are committed to the goal that this additional generation for Montana will be achieved by using the cleanest coal technology available. C91, C92, C275

I believe that we, as members of Fergus Electric, do need this generation. In 2011, we will be forced to go to the market to buy our power. It will be much more economical to build our own generation. C41

I have had the experience of building and recently helping maintain 2 other fluidized bed boilers in Montana, one in Colstrip at the Rosebud Plant, the other in Billings at the BGI plant. I believe this clean coal technology, when properly built and maintained, is environmentally sound. C267

I am a registered nurse and am aware of the emissions from coal fired generating plants. However, this plant is going to be the cleanest plant available and will surpass state and federal guidelines. We live about four miles downwind from the proposed plant and are very comfortable with this and have no plans of moving anywhere after the plant is built. C270

We have been in talks for the last two years and have agreed to sell SME the land for the plant. This was not an easy decision and it was only after they flew us down to Maysville, Ky. And seen how clean that the newest generator that was just completed was. There was no visible emissions and the only thing they we seen was the water vapor coming out of the cooling towers. C271

Response: Thank you for your comments.

2. *As a lay person, I found the EIS virtually incomprehensible. If this project is safe, it shouldn't take 725 pages to say it. C3*

Response: An EIS has a set format by regulation and is not meant to be read like a book. Certain topics must be addressed. This includes the evaluation of the issues raised by the public and then the development of alternatives to the proposed action that must address those issues. An EIS must describe the setting of the proposed action and where the impacts might occur and then it must describe the potential impacts that may occur if the proposed action or the alternatives were to be implemented. The easiest way to tackle an EIS is to read the summary, then read

the proposed action and any alternatives that interest you. Then read the information on the existing or effected environment and the environmental consequences section for the areas of interest to you. Impacts may be directly caused by some aspect of an alternative, they may be indirectly caused by the action. Then in combination with other activities in the area: past, present, and reasonably foreseeable activities; there may be a cumulative impact to be disclosed. All this must be disclosed regardless of whether or not a project is anticipated to be safe or not. Although NEPA regulations state an EIS should be 150 to 300 pages long, it is generally difficult to write an EIS to be that size, especially if you add appendices to the cost of the EIS.

3. *The consulting company which represented SME is the same company that represented the Thompson Falls project. The Thompson Falls project is a disaster. There is reason to question the impartiality of the "independent contractor" in the preparation of the DEIS. Montana DEQ should require an independent assessment of both the need for and the best available technology for use in any Highwood Generating Project. C3, C8, C77, C165*

Response: SME's contractor did not prepare the EIS. The third-party independent contractor which did prepare the EIS has no ties to SME. RUS contracted with this consulting firm – the Mangi Environmental Group. SME provides a source of funds from which RUS authorizes payments to Mangi. Purpose and need is established by the prospective borrower as part of their loan application to RUS; RUS thoroughly reviews/approves the purpose and need before the EIS process is begun. DEQ followed the established permitting process according to its regulations in determining what constitutes best available technology.

4. *Montana's greatest assets are her citizens and her clean, healthy, and beautiful environment. Please don't allow SME to damage Montana's citizens or environment. C3*

Montana is a beautiful state and harmful emissions will do nothing but harm our earth and our people. In the long run it will hurt everyone, even the people that are behind this project and the people that work for it. People will finally realize when something bad happens. No amount of money is worth health and life. C194

Everyone in the Big Sky State prides themselves on living in one of the last best places; so proud in fact that we use that moniker in our tourism business. Yet we are steadily destroying what makes Montana beautiful. The Berkley pit was one a mountain as beautiful as any of the Rocky Mountains. Remember when smog was only a California problem? The problems of the cities are here and if the coal plant is built they are here to stay. C208

We do not need to defile our own back yard here in Montana. This is the Last Best Place and we had better not do anything to tarnish and poison our beautiful state. Stop looking at the bucks and start thinking correctly about how we treat our land, our people, our wildlife and our atmosphere. C254

No to global warming, mercury. Don't sully the wind of Great Falls. C255

Who could be cheerful or willing to spew mercury in the air of Great Falls & create more global warming? C256

I am a native of Great Falls, Montana....While recently vacationing in my hometown, I was dismayed to learn that Great Falls is considering the construction of a 250 MW coal-fired power plant. C265

A coal-fired power plant building proposal in 2006!...and during a democratic governor's administration! I am outraged and I am not even downwind from its proposed site. (I am West of GF.) I'd rather have brown-outs! C279.

Give us more wind farms, solar power generation and biofuels for our cars, tax our frivolous use of energy but do not pollute our air for the extravagant energy usage or out-of-staters and to make one company (probably not even American or possibly based in the Caiman Islands to evade taxes) rich. C279

3,0522,081 tons of Carbon Dioxide and 40 pounds of mercury a year going into the air is more poison than I want them or myself to breathe. C301

Response: SME provides energy to the City of Great Falls and industries located in the Great Falls areas as well as five cooperatives Montana. After going through a thorough site assessment process, Great Falls was the most suitable site for a number of reasons. Please read Chapter 2 for a description of the process involved. SME has applied for an air quality permit; even though emissions would be allowed, they must be protective of human health and the environment,

Please look at comments in Sections 601 and 602 for more comments and responses regarding air emissions and mercury.

5. *I support the Highwood Generating Station. C5, C15, C37, C41, C42, C49, C53, C67, C83, C96, C103, C114, C115, C120, C130, C139, C141, C143, C148, C158, C161, C267, C270, C271, C306, C322, C323, C324*

I'm assistant business manager for the International Union of Operation Engineers, Local 400, and president of the North Central Building Construction Trades Council. I have my associates coming to the mic. All of us standing here are considered to be leaders of the union movement in this area. And that may well be, but we are also all environmentalists. And we care deeply about this area we call home. C66

This project is not the brain child of the investment group designed to turn maximum product, while exporting power to the highest bidder. The Highwood station will be owned by the customers it serves. I bring with me over -- well, actually let me give you the right number, 4,139 signed and dated postcards with statement of support for this plant. The cards are signed by members of the Yellowstone Valley Electric Cooperative.

They are signed because the members want control of their energy future. They want and need stable, long-term electric rates, not just for their homes, but for their farms and ranches and other places of business. These people believe in the cooperative model business. They trust Southern Montana is making a solid investment in the future of their livelihoods. C161

We need a new generation of cleaner coal fired power plants in this country, so some of the older plants can be retired. C163

I have witnessed the progressive erosion of high-paying jobs, and value added industries from Montana to other states and overseas. Building the SME plant near Great Falls in small part reverses this trend. There is and will continue to be demand for power in Montana. It will be generated. Let's do it in Montana instead of elsewhere. C322

It is unfortunate that through the occasional commission of acts of violence, the environmentalists have lost some of their credibility. Would that they could be sent back in time to the cast-iron wood-fired cook stove, and the kerosene lantern as the only source of light. Yours truly has been there....We are right now experiencing another climate change in which the summers will grow progressively warmer. We have a choice; either increase generating capacity or experience power interruptions or brown-outs. C323

This project will benefit Montana citizens with high paying jobs. The plant will bring long term and reliable electric service to thousands of Montanans....What I am especially concerned about is that if this project is disapproved it will put thousands of Montanans at risk for being charged higher and higher electric rates. C324

Response: Thank you for your comments.

6. *The DEIS states that the scoping process to solicit public input on the proposed SME-HGS project began in the fall of 2004. A public meeting on October 13, 2004, at the Great Falls Civic Center involved fewer than 100 citizens. The format of this meeting and the information provided offered insufficient opportunity for the public to provide appropriate comment. For example, those who attended were given no opportunity to question City of Great Falls officials. Therefore, citizens had no authentic opportunity to discover the relationship between SME and the City of Great Falls. (Neither has such opportunity been offered to date.)*

Other public meetings and media coverage have been carefully crafted and limited by SME to offer selling points for the plant. Therefore, public concerns about the plant did not surface during the DEQ scoping period (spring of 2005), as evidenced again by the registry of a mere 45 citizens at the DEQ scoping meeting in Great Falls on April 18, 2005. Also, most of these meetings have been scheduled during the work day which has made it difficult for many of us to attend.

If one contrasts the 2004-2005 lackluster public scoping response to the significant level of public response to this summer 2006 DEIS, the insufficiency of the earlier scoping opportunities are evident. C8

Many people have told me they were never notified of any of the meetings for the HGS. The EIS documents the scoping meetings held in the last 2 years and how the public was notified. As I have followed this project closely for quite some time, the first meetings started in August of 2003, so there has been much opportunity for public involvement. C306

Response: Scoping under the Federal and state environmental policy acts requires that attendees be given the opportunity to comment. Comment forms were provided at this meeting for this purpose. Additional opportunities for comment were also provided in the form of email as the email addresses of both the RUS and DEQ project managers were provided and U.S. mail instructions were also provided to the public for both agencies. The DEQ project manager extended written invitations to specific members of the public who signed up during the RUS scoping meeting. The purpose of scoping is to solicit comments regarding the key issues to be addressed in the EIS; if an attendee believed the relationship between SME and City of Great Falls was such an issue, the opportunity to submit a comment to this effect was given.

RUS and DEQ held their scoping meetings during the evening, not the day, making attendance more convenient for the working public. Agencies provide the opportunity for and encourage public participation, but are not responsible for the level of attendance by the public. Based upon the experience of both RUS and DEQ with other EIS projects, there tends to be greater public response to draft environmental documents than during scoping. This tendency also appears to have been borne out with the proposed SME HGS project.

SME may have held a few meetings during the work day; however, the majority of the SME public meetings were held in the evening. Since announcing its intention to move forward with the construction of HGS, Southern Montana Electric G&T has made in excess of fifty public presentations in the area that will be served by HGS. For example, a presentation to the Great Falls City Commission was made on 19 August 2003 for the purpose of furthering discussions regarding the City's interest in participating in HGS. The meeting was open to the public and well attended.

7. *Not until DEQ issued the [Draft] Air Quality Permit, late winter of 2006, did citizens begin to become aware sufficiently to question the City of Great Falls/SME plans for this CFB plant. Only then did the grassroots group Citizens for Clean Energy (CCE) emerge. Since then, City officials have rejected a number of requests for a public meeting on the coal plant. Therefore, it has been most difficult to get information about responsibilities the City is incurring. Information from SME has been limited to its web site, which has offered only certain particulars.*

The public has been denied access to complete and accurate information during the planning process. Most communities that consider such a public venture seek voter approval of the project. That the City of Great Falls should deny open consideration of this project is unacceptable. C8

There is public concern in Great Falls that the decision for a partnership with SME and that type of electric generation was made without public discussion. C29

In 2003 our city charter, our code, was changed. It was a vote of the city commission to start Electric City Power. When they changed our charter, it started Electric City Power, and part of that charter change said that before any general obligation bonds or taxes were spent on Electric City Power, there would be a vote of the people, and a majority vote of the people would allow the city to spend money. We have not voted on this. I hope, and perhaps we'll be able to vote in November on it, but I'm not holding my breath. C68, C116

The City of Great Falls, Montana, has never permitted its Citizens to vote on whether they want a coal plant business venture in Great Falls, even though it is the taxpayers who may be forced to cover losses in the development and possible operation of the plant. The Cascade County Commissioners have never approved the plant, nor consider its economic and environmental consequences to this region. Others living down wind from this plant have never been involved in the decision-making. Questions put to the city concerning proof of those willing to buy the power and the nature of the contract and the list of public meetings they have submitted to you have never been provided me, although I have requested them. How can citizens be permitted to meaningfully participate in a process which has been determined without such participation and then when participation is only granted if it supports the city manager's view. C78

I believe in the value and mission of rural electric co-operatives as well as municipal public power authorities. Few if any in our group oppose the Highwood Station because it is "public power" or part of a member-owned cooperative. It is precisely because it is someone else's cooperative, in a different part of the state, that we ask and demand that they distribute the benefits as well as the costs among their own members, and in their own region. As for the City of Great Falls and the Electric City Public Power entity, that is a problem we will have to solve for ourselves. This is only one of many boondoggles undertaken by Mr. Lawton and his cronies at our expense. We expect that he will resign or be dismissed shortly, and that his participation in this ill-fated venture will be annulled. The balance of public opinion is swaying markedly against the Highwood Station, and we expect that our complaints will soon find recognition in the official policies of the City of Great Falls. C134

The city of Great Falls has gone ahead with their plans without allowing its citizenry to have a vote on the matter. C250

I am writing regarding the Montana cities, including Great Falls, going in to electricity business....I think this is something that none of them know anything about. This reminds me of Montana Power going into the communications, and leaving a great Electric Co.

they knew and had done real well with....If they were to get set up in this, I think that a coal fired unit is not the way to go. Prior to even thinking about this, the City of Great Falls and the Cascade County commissioners made it impossible for NorthWestern to set up the gas fired generators they had planned. They are telling us how this is one of the best units of its kind. This may come under new regulations in a few years and be another big expense. C327

Response: In this case, neither RUS nor the DEQ has any control over the City of Great Falls' efforts to provide information, conduct meetings, or allow a vote on the city's bond issue. This item is outside the scope of review of the EIS.

8. *SME is continually modifying its proposal. After the DEIS comment deadline, how is the public to be kept informed of these modifications, and what is the appropriate method to respond to such changes? C8*

Response: Any material changes to the proposal would be in response to comments/input received thus far from RUS, DEQ, or the public, and be reflected in the final EIS. The public will be given the opportunity to comment on the final EIS, per NEPA requirements and RUS regulations. The State of Montana MEPA process does not provide for a comment period on a final EIS.

9. *Who and how are the Feds going to ensure that "all necessary actions are taken for the prevention, control and abatement of environmental pollution"? C8*

Response: If the comment is referring to air quality, wastewater or solid waste, the state permitting process, which is authorized by the U.S. Environmental Protection Agency, assures compliance with the necessary standards; no Federal action can proceed without this compliance. If the comment refers to "environmental pollution" in general, the impact assessment process and any required mitigation actions assure there are no significant impacts on the environment.

10. *The DEIS does not fully comply with the Montana Environmental Policy Act (MEPA) to promote "efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humans." Emissions of CO2, SO2, nitric acid, mercury and other contaminates are not acceptable, especially when alternative clean energy sources are now available. C8*

Response: The DEIS and the air quality permitting process both assist with efforts to prevent and reduce pollution that would otherwise have occurred. With regard to CO2, there are no Federal or state standards for CO2 emissions, and therefore, DEQ cannot stipulate CO2 emissions standards for the HGS. Further discussion is provided in responses to comments included in AIR-603. Moreover, DEQ cannot stipulate or mandate alternative energy technologies, if the proposed action complies with all air quality standards.

11. *The statement is generally well written and comprehensible to most audiences, but 14 pages of Executive Summary preceding the vital Table of Contents makes general access*

to particular passages in the text more difficult. For example, at an Open House in Great Falls in July 2006, even a DEQ staff person needed almost ten minutes to locate a particular set of facts about which I had inquired. C10

Response: Thank you for your comment.

12. *The compartmentalized structure of the document does not cross reference important facts from one section to another in a meaningful way. For example, a rather thorough treatment of hazards of mercury poisoning stands alone (3.3.5), so that sections dealing with biological resources (4.6.2) or recreation (4.8.2) do not even mention this important subject. C10*

Response: An effort has been made while preparing the FEIS to provide more cross-referencing between sections.

13. *This new coal plant will add pollution to our environment. This is a point that cannot be disputed. No matter how “clean” the plant is, an ounce of pollution produced is an ounce more than what existed before. The dilemma is that we do have other cleaner ways to produce power, methods that produce no harmful byproducts, such as wind power. The reason that these alternative methods are not being placed in the Highwood area is not because they are ineffective, but rather because they do not turn the same hefty profit that a coal plant would. C276*

The entire state of Montana is being developed by wealthy corporations and out-of-state developers....The name of the game is more money for them and more pollution for us. We need a Public Utility that will give Montana Tax Payers a break in their energy bills and taxes. C280

The State has been sold out to Big Money and greed far too many times in the past. And we don't want it happening again, especially when it would affect our health and that of our friends and family. C287

Why is this plant even being considered? Are you people being bought off? I know how corporate America operates it is all about profit. C292

I cannot believe greed could overcome good sense and that we would actually agree to poison ourselves with a plant that pollutes with noxious emissions and mercury and brings on more global warming. C304

We have all seen what greed and avarice have done to Montana....A businessmen should not be allowed to poison the atmosphere of this city and this state and endanger all of the inhabitants because they can see nothing but dollar signs....Even California does not allow coal plants, nor will the governor of Idaho, our neighboring state. C308

The proposed HGS is a clear example of a failure of government at all levels to serve the people. It appears to be promoted by short-sighted few, and driven along by those who

stand to profit from the project and by those who have succumbed to the lure of tax revenues. These people are blind to the broader energy issues at stake here and the environmental impacts at larger scales. C334

Response: Thank you for your comments.

- 14. The technology planned for this enterprise is outdated. It will contribute pollution on a serious scale. There are better and safer technologies available. In this day of global warming, such proposed methods of producing power should be out of the question. C13, C16, C17, C29, C35, C38, C46, C48, C54, C56, C58, C59, C72, C74, C86, C88, C121, C123, C168, C170, C207, C233, C250, C252, C280, C287, C302*

I would like to remind the board that coal is a dirty fuel that contributes to global warming. Also, the technology that is proposed for this particular plant is certainly not the cleanest that is available. California currently forbids the construction of coal-fired plants. The governor of Idaho recently announced that Idaho would not build coal-fired plants in the future either because, "Idaho's citizens deserve better." Montana deserves better too! C179

Why would Montana want to build more coal plants and mire us in the 19th century? Let's move forward! C216

Wrong plant. Wrong technology. Improperly studied. Don't build. C236

I think the coal-fired technology is out-dated and produces unacceptable levels of carbon dioxide and mercury pollution. IGCC technology offers much more efficient production of energy with added benefits of much less pollution, although admittedly, at an initial higher cost. Still, I believe the cost is worth the long-term benefits of preserving our current quality of life, minimizing atmospheric carbon dioxide accumulation and probably avoiding a future "carbon tax." C263

While I support generating more power locally and am in favor of cooperative efforts from Montanans to boost our economy, I am opposed to the technology being considered and the pollution that will be generated. The "circulating fluidized bed" technology doesn't appear to be as efficient as other options.... C313

Response: The combustion technology proposed for HGS was selected after a thorough review and elimination of other possible means of generation. The technology was chosen as the most feasible based on its ability to address the purpose and need, be technically feasible, cost effective, and limit emissions to meet current federal and state standards.

- 15. This project, if approved, will be another example of short-term profiteering at the expense of long-term destruction. Just as Montana Power so unwisely speculated on the water power readily available. The region is already seriously impacted by the arsenic*

plum created by Anaconda Copper. Montana must be vigilant in preserving our environment. It's our constitutional right. C13, C50, C111

If we in the most prosperous nation of the world and in a state with the strongest constitutional guarantee to a "clean and healthful environment" can't set the example for making a decision in the best interest of public health and the planet, what hope do we have for impacting the 750 coal plants that will be built in China and India during the coming decades. A modern world needs electricity, but we also need clean air and water. C20

The Constitution of the State of Montana, Article 9 Environment and Natural Resources, Section 1 Protection and Improvement, One, the state and each person shall maintain and provide a clean and healthful environment in Montana for present and future generations. C18, C111

I had the honor of being elected as one of 100 delegates to the Montana Constitutional Convention in 1972. We debated over the wording in the document to give Montanans the strongest environmental protection in the country....We are very fortunate to be protected by our Constitution. Clean air is among Montana's most significant assets. It would be tragic to permit mercury emissions, particulate matter, and greenhouse gases to harm our beautiful state. C262

Not only am I concerned about Highwood Generating Project, but the Co-Gen Power Plant in Thompson Falls. I do have the right to clean air and water. C281

Response: Montana's environmental permitting regulations are promulgated to maintain a clean environment for all Montanans. This project as proposed will meet or comply with those regulations.

16. *The Draft EIS documentation that has been provided, while lengthy, is woefully inadequate. It does not address many health, environmental and financial concerns. C14, C58, C84, C105, C151, C167, C168, C331, C334*

After studying all the information at my disposal, I must say that there are too many questionable areas that are either unanswered or not addressed totally in the "EIS" concerning the proposed HGS near Great Falls....Please do not issue an air quality permit until all questions have been thoroughly analyzed properly. Mistakes could be devastating, in many areas...and the populace does not deserve that! C249, C302

This DEIS should be scrapped in favor a real analysis that places value on human lives and the human environment rather than the coop pocketbook. C303

The proposed Highwood Power Project and accompanying draft EIS are inadequate as currently designed. The proposal presents an unnecessary and dangerous threat to our environment, public health and welfare, and economic stability. C312

What I find most distressing....is that the proposal, which is being made in a context of recognized problems, some of which can be dealt with by way of technical and technological adaptations but some of which require of us value and/or attitude adjustments, will not be considered on the deeper level that is warranted by the realities of our times. In the light of such things as global warming, for example, all of the relevant problems require of us an urgent reassessment of how we have been living as Americans and Montanans, and a commitment to ways to realize the values that survive that critical reassessment which enable us to affirm them without creating a future for ourselves and coming generations that is intolerably degraded from what we know now, let alone what we inherited when we became old enough responsibly to participate in social, economic, and political life. C319

Response: An EIS is required to provide sufficient information to address issues to the level necessary to make an informed decision. This does not mean that an encyclopedic volume of information must be included for each issue raised by the public. Health impacts are addressed in the EIS and additional information is provided in Section 1300 in this Appendix. Numerous environmental resources are covered and the impacts identified and discussed in the EIS and responses to comments relative to those resources are presented in this Appendix. Since air quality is the primary issue of concern, it has the largest resource section. Financial concerns are not covered in detail as they were not brought up as an issue of concern and are outside the scope of this EIS. Cost in terms of mitigations is not a reason to require or not require it. Financial arrangements between SME and the City of Great Falls are outside the scope of this EIS.

17. *Where is the complete current "Up to Date" business plan, allowing the R.U.S. to compile their due diligence, which would show this loan to be viable and not a financial scam using taxpayer's money? Despite repeated requests, this "Up to Date" plan has not been available to the public for study, and no "Up to Date" financial report was submitted to the R.U.S. Somehow R.U.S. has to be able to show to the public how this money will be repaid in a repayment schedule and over what time period? C14, C78, C111, C174*

Where are the documents in this draft EIS showing "The Itemized Use" of these tax dollars? There are also missing documents which would show allowance for contingencies and inevitable cost-over runs; this is important for the R.U.S. financial lenders. How much in cost-over runs is the R.U.S. allowing? All the cost estimates for this plant are older than one year. Is the R.U.S. going to require current cost bids? C14

Capitalizing this plant will require certain loan security of this large loan. Will the R.U.S. require the documents showing the origin of the boiler, the boiler cost, the condition of being new or used? Also how much of the plant will be allowed to be used equipment? C14

There needs to be a complete new draft EIS. The R.U.S. is morally obligated under standards of Good Business Practices to tell SME and the City of Great Falls that no

loan guarantee of any type will be forth coming until such time as a new document could be prepared with up to date cost, time schedules, complete business plans, signed contracts showing length of negotiation and price and quantity of product delivered. Such documentation should include all avenues of power supplied and types of help offered from different electric companies. The R.U.S. must require that accurate information is given in every aspects of the new document. C14, C20

Response: The financial viability of the proposal must be demonstrated as part of a prospective borrower's loan application to RUS, and in turn forms a large part of the RUS review. Much of this financial information is contained in publicly available documents such as the Load Forecast Study and some of it is confidential and is not publicly available.

The loan application process to the RUS requires a prospective borrower to provide financial information, load forecasts, and requests for alternatives (i.e., building generation vs. buying power). This information is reviewed and the proposal is determined to be feasible prior to the EIS being started. Throughout the EIS preparation phase, the prospective borrower meets periodically with the RUS (both loan and environmental staffs) to update information as necessary. The RUS process assures that the information provided by any prospective borrower is accurate, current, and in conformance with standard financial and environmental best practices.

The use of contingencies in estimating the cost of the project is standard. These contingencies are reviewed with RUS in the application for a loan. If appropriate, periodically in the course of project development the project cost is reviewed. Should there be increases in the original estimates of project cost, the borrower must provide the additional financial information for RUS review. Therefore, any project cost increases and their financial impacts are known prior to loan approval by RUS. The RUS procurement requirements are established to ensure new equipment and materials are utilized in the development of the project. All of these RUS processes and procedures have been time tested and served to protect both the cooperatives receiving the loans as well as the federal government and taxpayers.

18. Another reason for supporting this project is the cooperative spirit. This movement, contrary to other opinions, I believe is exactly what co-ops are all about, and have made this a very livable state over the past several years. Co-ops were started back in the days of my grandparents and provided electricity to them. This group today will seek and obtain affordable, stable electricity for Montanans. I think that's the key. We're not looking at some investor in utilities from out of state. The people that are doing this are friends and neighbors in our state. C15

The five cooperatives and the city of Great Falls are all local. We're all Montanans. I don't think any of this energy will leave the state. And we can be held accountable. That's considerably different than many of the large conglomerates who I think have taken advantage of Montana, have extracted resources from our state, taken them all out

of state, made money off of Montana. Our idea is to keep the energy here in Montana for benefit to fellow Montanans. And I guess just many of the board directors of the cooperatives have been around for years, and they have no desire to leave. C44

Response: Thank you for your comments.

19. I (we) oppose the approval of this power plant. C16, C20, C54, C60, C63, C69, C72, C82, C84, C86, C100, C102, C111, C112, C119, C122, C123, C129, C132, C136, C155, C162, C170, C171, C174, C175, C179, C186, C188, C189, C190, C191, C192, C193, C194, C195, C196, C198, C202, C204, C206, C207, C222, C250, C252, C257, C258, C261, C262, C263, C268, C272, C274, C277, C279, C280, C283, C291, C294, C295, C297, C299, C301, C302, C304, C305, C308, C309, C311, C320, C321, C325, C329, C330, C333, C335

I oppose the DEQ issuing the above [draft] air quality Permit. Furthermore, I believe the DEIS is flawed, that there should be no ROD issued until the DEIS has been corrected, and finally I oppose the REA, of the US Dept of Agriculture providing guarantees, loans, and moneys for the development of the Highwood station. C78

The draft [EIS] at 700 pages is formidable and seems to cover many important facts. I want to call attention to the overall approach of this project. It seems to me that backers are encouraging a "this is good enough" or "this is the best we can afford to build" attitude. This is seriously flawed. It fails to recognize that a crisis in levels of heavy metals and chemical toxins in our atmosphere is rushing toward us at great speed...at this point the study offers choices we should not make. Only the very best of technology can be chosen. C173

My intention is not to patronize but assist. Our world is in danger of such setbacks. It is our job to keep it safe for our children and theirs. Our world already has too many problems to deal with and this should not be one of them. People have worked too hard to watch a company start up a facility so archaic. We are past the times of coal burning and should not think twice about its construction. It is an abomination to science, technology, and our current way of life. C205

I live near Colstrip and have lived through countless reassurances that all is well with practices of the industry there, in spite of some problems that are becoming increasingly visible to local folks....Many times we have gone through the EIS process, a process that seems to give lip-service to the law, but has an undercurrent of bias towards let's-build-whatever-it-is-this-time. We gotta have jobs today; the grandkids will figure out something when some of this goes sour. And customers keep asking for more power, believing the reassurances and seemingly unaware of the true costs to the people and the land. C328

Based on information provided at meetings, newspaper articles and concerns of respected citizens and community leaders in the affected area, it is my opinion that this proposed project will cause more harm than good. I'm all for good paying jobs,

increased tax base and energy options, but sacrificing a clean environment and a good quality of life for a few jobs and money is not the solution to the problem. C329

Response: Thank you for your comments.

20. *Coal-fired power plants (particularly the type proposed in Great Falls) are highly polluting and economically risky. C17, C56, C61, C70, C81, C124, C135*

I believe that it is very short-sighted and irresponsible to build the plant as proposed because of the mercury emissions, carbon dioxide emissions, and large consumption of water from the Missouri River. C259

Response: Thank you for your comments.

21. *For over 2,000, 3,000 years plus, many generations before me, my people have lived off the land. And one of the things that they have done and that they have told us many times before is you don't fool with Mother Nature. And that's what they're doing here. And if we're messing with Mother Nature, there's a consequence. And there are some things that are far more powerful than we as humans. And I think those are the consequences that need to be taken into consideration here. C18*

Response: Thank you for your comment.

22. *Considering the far reaching and longterm adverse impacts of the coal plant, the amount of time given to the public to weigh in on this issue has been woefully inadequate. We appreciate the two weeks extension of the deadline, but because this issue is so complex and because the public comment period falls within the busy timeframe of summertime vacations, we feel the public has been shortchanged in this process. It is clear that the more informed people have become, the greater their level of opposition to the coal plant. We hope the RUS and DEQ will consider further extending this deadline for at least another 60 days, leading up to the November elections so that our politicians can weigh in on this important decision. C20*

Response: The RUS and MDEQ have followed all mandated time limits under Federal and state laws and, as noted in the comment, have provided for additional time periods. At the request of the public, MDEQ and RUS allowed for additional public comment in a second public meeting at Havre, Montana.

23. *Despite its public claims that it has "60 years of experience" in providing electricity to rural Montana, SME has had NO experience in the competitive and complex world of power generation and has had no experience in managing the round-the-clock grid transmission. In fact, SME was formed on May 31, 2004, following its "divorce" from Central Montana Electric Power Cooperative (CMEPC); this separation was triggered by irreconcilable differences in opinion about the coal plant proposal. Of the 14 original members of CMEPC, the overwhelming majority of member cooperatives (9) refused to*

participate in the risky plan to build a coal plant. The remaining 5 cooperatives formed SME. C20

Before loaning any money to SME, the Rural Utility [Utilities] Service needs to find out why the overwhelming majority of rural electric cooperatives serving our area refused to participate in building a coal plant. Consider that SME has no experience operating electric generation facilities, and they do not have the coal expertise in managing the transmission grid. C77

Has SME ever built any power generating station before. And have they ever managed the transmission grid? C54

Response: The prospective RUS borrower and ownership and operation of the proposed activity are evaluated along with other technical and financial criteria as part of the loan application process. SME and its member cooperatives have experience in many aspects of the electric utility industry. They have worked with BPA, WAPA, PPL Montana, and Northwestern Energy in wholesale power supply and transmission capacity procurement. SME was formed to provide power supply to its five member cooperatives, and this was reviewed as part of the loan application process.

With regard to the implication that Southern Montana Electric G&T's staff is woefully lacking in experience, according to SME, the core staff that launched Southern Montana Electric G&T (Warren Bickford and Tim Gregori) have a total of 58 years experience in the electric utility industry. They have a combined 32 years experience in wholesale power supply and transmission capacity procurement. From the time the decision was made to form Southern Montana Electric G&T in November 2003, they have negotiated contracts with the Bonneville Power Administration Power Business Line (BPA PBL), the Western Area Power Administration (Western), PPL Montana LLC, NorthWestern Energy Transmission Services Group, the Bonneville Power Administration Transmission Business Line (BPA TBL) and the Western Area Power Administration – Transmission Services Group.

Additionally, according to SME, Southern Montana Electric G&T is a registered entity on the OASIS as SMGT01. This is an important attribute as the OASIS is the mechanism utilized to schedule power transmission transactions. Southern Montana Electric G&T has renegotiated bifurcated BPA TBL contracts that separately serve the needs of Central Montana and Southern Montana Electric G&T, renegotiated the NorthWestern Energy NITS agreement in the name of Southern Montana Electric G&T, negotiated a new NITS agreement with the Western Area Power Administration transmission services group, and have continued to update the model real time telemetering system that protects the cooperative members from supply market volatility.

24. *SME's customer base is in southern and eastern Montana, so it appears that not only is it inefficient to haul the coal hundreds of miles, but also it is inefficient to transmit the electricity back to energy-rich southeastern Montana and northern Wyoming. C20, C151*

If Montana needs to produce more electricity from coal, they should produce at the mine, to save energy, and keep all the pollution in one sacrifice zone. C35

It would seem more practical that a facility dedicated to serving the needs of the energy industry in Southeast Montana could be built near that site, if only for the economic benefits of transporting the coal fuel and electricity much shorter distances. C10

Coal mined in SE Montana will use petro fuel to ship the coal to GF, then burned here –a poor, inefficient use of fuel. C333

Response: The Site Screening and Site Selection studies conducted as part of the proposal development phase explain in detail the criteria and processes used in choosing the proposed plant site. Additional information from these studies will be included in the FEIS. Forty percent of SME's customer base is in relatively close proximity to Great Falls. In fact, if the plant were to be built in southeastern Montana, much greater transmission infrastructure construction would be required, as noted in the referenced studies. Other environmental factors were weighed in the elimination of alternative sites, such as access and the availability of water, heat rate, and the proximity to Class I air areas and Indian reservations.

25. *As part of its overall agricultural mission how much better it would be for the RUS to use its twenty-first century federal tax dollars to fund futuristic distributive renewable energy sources such as the emerging biofuels industry, windfarms, and small hydropower, thereby bringing additional "crops" to struggling family farms. C20*

Instead of encouraging rural electric cooperatives to become producer-cooperatives of distributed, farm-based renewable energy (wind, biomass, solar, etc.), they are funding more old-style coal plants which have proven to be environmentally disastrous and economically unsound, given the external costs of global warming. C134

Response: RUS also funds renewable energy projects, but addressing the mission of RUS is outside the scope of the EIS.

26. *I believe that all parties involved in the process have done well in including public input, including the RUS, SME, the Montana DEQ, and the City of Great Falls. From the beginning of our energy venture, the city has kept its activities highly visible to the public and has provided opportunity for public input at every public meeting it's held. C22*

Over the past several years, there have been at least 50 public meetings relating to the city's energy activities before the Great Falls City Commission, Great Falls Neighborhood Council, the Electric City Power board of the directors, and the Montana Public Service Commission. C22

Montana enjoys some of the best open government laws in the nation. And in Great Falls we pride ourselves on being an information resource to the public, as well as including public input into all of our processes. Our energy activities are certainly no exception.
C22

Response: Thank you for your comments.

27. *I urge all decision makers not to base your decision on the fact that the proposed plant has gained a certain momentum and has many supporters, many whom stand to financially benefit from an affirmative decision. It is not too late to change direction.*
C24

Response: Thank you for your comment.

28. *I cannot find where the applicant has done extensive scoping and alternative review with the primary downwind communities in Montana and Canada. This would include extensive discussions with the Indian Nation residing at Rocky Boy Reservation. The Final EIS should include discussion and documentation of the public scoping and mitigation incorporated into the plan to give priority to the primary downwind recipients of the pollutants from the proposed plant.* C25

What 'scoping' was done for citizens outside of the City of Great Falls to get their input, especially when many rural residents, ranchers and farmers already use Northwestern Energy, and where is our right to be heard, as this could effect Northwest Energy's rate structure and service for Cascade County citizens outside the city? C80

The process that has occurred with this proposed power plant seems one sided. All the scoping hearings and hearings for the draft EIS have taken place in Great Falls. We were not given notification of these hearings. Hearings should have been held in multiple communities that this power plant will service and impact. C104

All during the RD and DEQ scoping process, not once did the Fort Belknap notice a scoping meeting being held on a Native American Reservation. With the high unemployment rate and poverty, many Tribal members are unable to travel, due to high fuel places. C320

Response: The DEIS, Section 1.5.1, describes the scoping process that was undertaken, and includes web links to detailed scoping reports that were completed by RUS and the DEQ. The Record of Decision will describe any required mitigation. There were no requests from the Rocky Boy Reservation to hold scoping meetings after the RUS and DEQ scoping meetings. As required by the EIS and NEPA, MEPA requirements and processes, notification was made to the potentially affected public by means of public legal notices and news releases. These notifications and releases were noted in the public scoping report as recorded in the DEIS document which has been carried over to the final EIS document. In

addition, when the first draft air quality permit application was issued on March 30, 2006, additional public notification occurred which fulfilled the requirements of the MDEQ process.

The number and location of scoping meetings is determined by the magnitude of the proposal, the potential area of effect, and population size and distribution. It was determined that one scoping meeting each for the RUS and DEQ, which occurred at separate and distinct times, was sufficient.

29. Short of court injunctions, my question is whether there any way at this point to stop the progression of the power plant, or is this a done deal? C27

Response: The proposed project will progress to the completion of the EIS process. Once the Record of Decision has been signed, one could challenge the EIS under NEPA or MEPA through the Federal and state court systems, respectively, depending on whether the Record of Decision is a joint one. The state air quality permit has not been issued, to date, in final form. There is a Montana state appeals process to appeal the air quality permit.

30. The fact is that the Draft EIS presents the public with non-scientific and conflicting misinformation. The document reflects a close cooperation between the proponents of the coal industry and the DEQ. C29

Response: Thank you for your comments.

31. I have many more objections to the awarding of a permit for the Highwood Generation Station. At minimum, there should have been wider collaboration between Montana governmental agencies such as the Fish, Wildlife and Parks, and especially the Montana State Historic Preservation Office before a Draft EIS can be complete. Since it is obvious that there has been a great deal of collaboration between SME and DEQ in the composition of this Draft EIS, there has been a failure to understand the unintended consequences in a wide range of subjects from air pollution to social impacts for this document fall far short of its objective. C29

Response: Notice and coordination was completed with a large number of state and federal agencies as shown in Appendix D. The array of topics covered in the EIS reflects the breadth of concerns considered. The Table of Contents lists 14 resource areas, including air quality and the socioeconomic environment. Additional consultation is occurring with regard to the Great Falls Portage National Historic Landmark, and the FEIS documents this consultation process and any mitigations recommended as a result of the consultations.

32. As I heard about the opposition to this power plant, my big concern was what are we going to do in the future. It's been pointed out by some of the SME board members that we're going to be out of electricity shortly. Where is it going to come from? I know there's a few against the HGS, but on the other side there's many Montanans that would

benefit: Homes, businesses, and agriculture. It appears that some people come up with reasons to stop any kind of new production of electricity or energy. And I wonder how many people are willing to turn off their lights, do without your computers, shut off your air conditioning. I enjoy the 21st century. I know we have to go about this right, but I believe we need a good solid supply of electricity. C31

I don't think Montanans should have to contend with brown-outs in the summer and rising costs at someone's whims while competing in California, Arizona, Colorado or other states for grid electricity. We could be producing that electricity through our local co-ops in our own state with our own people, with our own coal and, just for something different, providing a future for Montana. C31

Response: Thank you for your comments. The purpose of the EIS is to help determine whether the HGS should be financed and permitted to provide power for the cooperative.

33. *Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the HGS DEIS has been rated as Category EC-2 (Environmental Concerns - Insufficient Information). This rating is based on EPA's remaining concerns about potential visibility impairment at Class I Wilderness Areas, and additional information and analysis needed for wetland and aquifer protection in the FEIS. EPA believes additional information is needed to fully assess and mitigate all potential impacts of the management actions. C36*

Response: Appropriate information has been added to the FEIS to address these concerns.

34. *Under Section 6602(b) of the Pollution Prevention Act of 1990, Congress established a national policy that details preferences for pollution prevention. Pollution prevention, or "source reduction," encompasses practices which reduce, eliminate, or prevent pollution at its source. By reducing the total amount of pollution that is produced, there is less waste to control, treat, or dispose of, and there are less hazards posed to public health and the environment. We recommend that the final EIS identify how SME will avoid/reduce pollution at the source as the preferred course of action at the HGS to lessen the need to recycle, treat and otherwise implement Pollution prevention objectives. C36*

Response: The installation of a new facility brings with it the technological advances which have been made over the past years. This means there exist newer steam turbine blade designs and steam generator configurations which have been improved upon for many years and decades. When used in the proposed project, the results will be less utilization of fuel (coal in the case of the proposed project) for an equivalent unit of electricity compared to older, less efficient designs. Thus, in general, there is reduction in the pollution generated compared to these older facilities. Additionally, the use of Montana sub-bituminous coals and the hydrated

ash re-injection system requires less lime injection in the form of limestone utilization (and the resultant waste stream) for an equivalent removal process to control SO₂ emissions. This potentially results in less waste material which will be disposed in a landfill location. Finally, if the materials produced at the facility are deemed compatible for use in a secondary application, the material could be “recycled” into such items as concrete or road base applications. Options such as these will be explored once the material streams are identified. Other utility practices will be evaluated to determine if they are compatible for the HGS materials produced.

35. *The Montana antidevelopment community says the pace of life in American is too fast. The best means to control and reduce that pace is by controlling the availability of electricity. Their strategy is working. New hydro power is shut down. Nuclear power is frowned on. Coal-fired power is under attack. Wind power has serious problems. As each form falls on hard times, a replacement comes forward, but at much higher costs. What is the real agenda of the protagonists? In my mind, the answer to that question seems obvious. America, as we have known it, is headed into third world status. C37*

As a fourth generation Montanan, I ask the Montana majority to stand up, reinstate control over our future. Environmental elitists have had their way with us long enough. Montana is the milk cow for the east, west coast, and now the world economy must change. We must stop exporting our economy and leave our life blood in our own children. C37

I don't see why that we should kill this plant in order that someone else will build it and sell us the power at a higher rate, and maybe not as reliable. They talked last time in Great Falls about the steam plant not being reliable. It's the second most reliable plant going outside of hydrogen, and I don't think anybody can deny that. Every day we see more houses built, more buildings built. And every day I see a power line extended to them. They haven't adopted this alternate power of hydrogen whatever. It may come, but we cannot wait for it at this time. C43

Response: Thank you for your comments.

36. *The draft EIS outlines very well the study and work that went into the decision that SME made to build the HGS. SME has spent a great deal of time and invested money to thoroughly examine each step of this process. Some of the major steps we have studied were, number one, the need for generation; number two, the type of generation to build; and site selection. And I would just like to reemphasize that I feel that this draft EIS does a good job of outlining that. C39*

I believe we got a real sound EIS with standards that we'll meet, and also that our air quality permit is a very stiff one, which we plan to meet them, especially on the mercury rule. C41

Nothing that I've seen over the course of the past several years has caused me to have any reservation about proceeding on with this plan. The question tonight is whether the EIS is adequate. I've read part of it. In my view, it is adequate. It addresses the issues that need to be addressed. C52

I thank all of those that put the work into the draft EIS. I think they bent over backwards to try to get everything, spent more time and more paperwork on a bunch of junk that is worthless. But they have to do it, and they've done a wonderful job on this EIS. C57

I have reviewed the DEIS and have no concerns with it. The power plant will have a positive on local and state economies. It will provide jobs and power. It will have minimal impact on the environment. Please complete the EIS with haste so that this plant can be put into operation soon. C67

The completed DEIS was done very carefully and very thoroughly, with attention given to all areas of concern. Any concerns that I have heard expressed by the environmental community have already been addressed by the DEIS. C91, C92, C93

If this plant isn't built, if it really does get to a 120 degrees, then who is going to have the electricity to keep cool. I mean there are consequences to all of these decisions. But this is a good way to go. This is a good plant. I think you did a great job with the DEIS. I agree with the conclusions they reached on all the levels. C96

My reading of the published DEIS tells me that it is a reasonable, accurate reflection of the facts as they exist. The members of Southern Montana Electric must replace power they are now receiving from Bonneville Power Administration by the year 2011. It cannot do this with hydroelectric power nor with wind power alone. As a result, the most feasible and workable solution to this dilemma appears to be that which Southern Montana Electric has developed, a coal fired generating plant with the most recent and cleanest technology of proven reliability. This, coupled with the wind power being proposed to supplement it, will be cleaner than any other reliable source actually available to the consumers of Southern Montana Electric. C130

I think the HGS is a well designed, well planned, well thought out project. And I want to say that I think that you did a very good job working on the EIS trying to address the issues. C139

We're not claiming that HGS will solve the nation's or the state's energy needs, but is a solid step in the right direction. Building this plant would remove Yellowstone Valley Electric's, and the other cooperatives and City of Great Falls' reliability on plants such as the Corrette steam plant. This is a coal-fired steam plant with absolutely no emission controls. It's a stack and a boiler. This is a solid EIS and a solid air quality permit, and it should be resoundingly approved. C161

I believe the EIS for Highwood Generating station is a good quality draft put together by top notch engineering like Mangi and Bison. C163

As the General Manager of Fergus Electric Cooperative, I strongly support the Draft EIS and Draft Air Permit for the HGS. I believe that the Montana DEQ and the USDA Rural Utilities Service have done an excellent job of addressing all the environmental needs of the proposed CFB power plant east of Great Falls....I strongly agree with the Draft EIS and the Draft Air Permit that the environmental impacts on Great Falls and the surrounding area will be minimal. The four wind turbines will be a nice complement to the coal-fired power plant. If the four wind turbines are a cost-effective addition, it would likely encourage more wind generation to be built in the state. C44

I would like to commend both the Montana DEQ and the Rural Utility Services for the thoroughness of the DEIS for the HGS. I believe it covers all aspects of the proposed plan and alternatives. C306

It is understandable that some are now, and always will be, rightfully concerned about air pollution, especially here in "Big Sky Country." However, we've come a long way since the days of huge "sky-scraper" smokestacks belching black, sooty pollutants into the air. C323

Response: Thank you for your comments.

37. *Montana generates more electricity now than it uses. I believe that it is bad public policy to allow more power plants to be built in this state, especially non renewable, air polluting, greenhouse gassing generating businesses. This proposal boils down to the simple effect of a business, albeit a coop, seeking to profit at the expense of Montana's air quality. C46*

Response: The State of Montana, by regulation, responds to a permit application regardless of the reason or the power source. The permitting process determines whether the proposed project can comply with the state's air quality statutes and regulations. The air pollutants are addressed in other subject categories. Governor Schweitzer and the state legislature have determined that all state-based cooperative utilities must comply with the spirit of the law as it applies to other power utilities, and work to include 15 percent renewable sources in their energy portfolio. This project includes four wind turbines that would include 6 MW.

38. *DEQ has given the Thompson Falls plant three different permits. They were fining the plant \$1.8 billion upon inspection. But that's a drop in the bucket for a big corporation like them. The DEQ may fine the plant, but it's very rare for them to ever shut one down for violations. So who pays for that? We do in our health and well-being. C48*

My sympathies go out to the citizens of Great Falls. I say to them inform yourselves about coal fired generation. Know the facts for yourselves because you will be facing a barrage of propaganda. In promotion of a coal fired generator propaganda is elevated to an art form....Thompson River Go-Gen has been fined twice for non compliance. There will be no benefit, only pollution and destruction to our community. People were brought in for the 12 jobs that resulted after construction. Montana needs to reinstate laws to control the pollution from coal fired generators. C222

Response: The status of the Thompson Falls plant is outside of the scope of the EIS review for the proposed project. The proposed action is based on fulfilling the requirements established by the state and federal regulations at the time of the permit issuance. The benefits of the proposed action include up to 550 construction jobs and 65 permanent jobs. SME has proposed this plant to provide power from Montana coal for Montana customers and would most like try to contract with Montana companies for constructing the plant and hire Montana residents to operate the plant. The permanent workers would pay income tax, the plant would generate more property and income taxes than is generated from the land now, and there would be secondary financial benefits from support industries. This proposed project and any coal-fired power plant are subject to numerous statutes and rules that control pollution discharges and emissions.

39. *Regarding the EIS, I find it is very vague. I found many instances where it stated impacts cannot be specified or quantified, or, quote, "would likely lead to" or "probable likelihood of occurring." A really good example of EIS double speak, on EIS-9, "The overall rating from construction impacts would be adverse and nonsignificant." If the impact is adverse, which Webster says is meaning acting against or hostile to one's interest, how can it be nonsignificant? I think the EIS should have facts, not conjecture. It needs to be reviewed and rewritten. C48*

I would like to address some of the language that appears in the comparison of direct, indirect, and cumulative environmental impacts of alternatives that appear in the EIS document. It's an interesting thing. Small bits of language sometimes are very -- and you'll find in the Alternative 2, the Highwood Generating Station Salem site, proposed action, if you look at the bottom of each little item, it says that overall impacts would be adverse, but that they don't appear to be significant; nevertheless, the potential is for them to become significant. That seems to be the language in each item that we're discussing. C118

In numerous sections throughout the DEIS, descriptions of impacts of HGS on various resources contain the phrase "there is a potential for them to become significant." The phrase first appears on page ES-8, appears in numerous other impacts summaries in the Executive Summary and throughout impact assessment in the document. This phrase has no meaning, not only in terms of the matrix of significance developed by Mangi Environmental, but also in the context of the DEIS itself. If the impacts are likely to be non-significant, unless there is a projected change in circumstances that is discussed in the DEIS, there should be no "potential for them to become significant." This phrase should be eliminated in the Executive Summary and throughout the DEIS. C128

Of the 14 categories reported on (pages 9-10-11) under "Proposed Action: Highwood Generating Station – Salem Site," nine of these make the statement, "Proposed Action would be adverse and most likely non-significant, but with the potential to become significant." How can the DEQ issue a permit under these vague findings? C269

Response: Statements like “would likely lead to” or “probable likelihood of occurring” are conclusionary statements, not the analysis itself. Predictions in environmental science are often by their nature inexact, and necessitate broad ranges or levels of uncertainty. Impact assessment can result in adverse (or beneficial) impacts that are non-significant. The DEIS explains how significance was defined in Section 4.2.2.

Use of the phrase “...potential to become significant” has been re-evaluated in response to comments and a re-evaluation of what is required for an impact that is likely to be non-significant to become significant. Appendix J contains those definitions.

40. *I think right now you're building a big, white elephant. I think that the generating powers of the world, especially Scottish power that owns most of them here, the thing that you're building is an obsolete white elephant. In a few years, everybody's home is going to have a little power pack, a little hydrogen generator. There are all kinds of things on the market. C51*

Response: Thank you for your comment.

41. *I live where the air is very fresh, and the water is clean, and we would really like to keep it that way. For the record, I would like to ask if the Highwood station were be located upriver and upwind from Great Falls, Montana, would the same proposed technology be acceptable? Twenty-year-old technology has no place in Montana culture, land, air, and water. More time and more public input is necessary to ensure that we make the right decisions. C54*

Please take a new look at this plant and require it to use current technology and reduce its size. C55

Why generate the huge amounts of pollutants associated with this old technology? Whatever happened to wind power, solar power and good old-fashioned conservation? C309

This is old technology, which will emit unacceptable levels of pollutants, including mercury and CO₂ & CO. Has DEQ heard of global warming? Is there no Montana policy to minimize CO₂ emissions? C312

Response: Permit decisions are not based on the age of the technology, but on the ability of the technology to comply with current environmental standards and with the Montana air regulatory requirement of "best available control technology." The Montana DEQ has issued a draft air quality permit for this project finding that the project does meet this "best available control technology" standard. Moreover, the boiler design and pollution control technologies proposed for this project are “state of the art” advanced technologies proven in their applications. The NEPA process provides for one additional comment period after the issuance of the final

EIS. The pollutants regulated by Montana law are discussed in detail in the draft and final EIS. The greenhouse gas emissions noted in the comment are not currently regulated and an additional subject category of responses to the public comments (AIR-603) are noted in these responses.

42. *I say deregulation needs to be repealed. I say we need to take our dams back. C62*

We find it totally incomprehensible that this plant should have ever been proposed or planned as a "solution" to the state and federal deregulation debacle of our electric utility companies. These were legislative mistakes, sponsored and actually written, in most cases, by private corporations and industry associations in pursuit of their own private gain, not the public well-being and convenience. The process by which this happened was largely illegitimate, and even if we can't do much on the federal level to change or repeal these "de-regulation" policies, the State of Montana and the RUS can do a lot, within their own administrative and legal mandates, to minimize the damage which these industry-sponsored policies have brought about. C134

I looked at the draft environmental impact statement, and it's brought to you by the same people that brought you energy deregulation. Let's be clear about that. Deregulation is lawlessness. Privatization is selfishness. Public utilities are for the common, they're for the common good. C151

Response: Thank you for your comments.

43. *Part of me says those Great Falls politicians can just go ahead and lose their shirts - why should I care? But we really are all in this together. "We" will end up bailing out the SME folks, and 'we' will all be impacted by their greenhouse gas emissions and other pollution. There is really something fundamentally wrong with our economic and political and regulatory system if such a lousy proposal as this can somehow gain a critical momentum and then become unstoppable. C69*

Response: Thank you for your comments.

44. *I concur with all of the concerns expressed by Montana Environmental Information Center (MEIC) regarding the proposed power plant. C71*

Response: Thank you for your comment.

45. *This DEIS seems to be based largely on information supplied to it by SME, and as such the EIS is biased and incorporates these assumptions. This affects conclusions of the DEIS and results in a document that does not accurately reflect the truth. C77, C111*

It was clear to me in reading the DEIS that it was put together by proponents of the HGS, and the statements were not subjected to scrutiny of knowledgeable experts in the variety of areas that it addressed. C84

Response: Environmental impact statements on proposals for which RUS is considering funding and DEQ is considering permitting are prepared by contractors procured by RUS. It is standard practice for the contractor to rely on preliminary information and documents that the project proponent collects and prepares during the loan and permitting application processes. The USDA and DEQ are ultimately responsible for the content and findings of the EIS.

46. *Consider that this coal plant is many times larger than it needs to be. Where are the customers? C77*

Response: These topics have been, continue to be, and will be evaluated in the consideration and approval of the loan application. This is also addressed in the EIS through the discussion of predicted load demand. See also response to comment #23.

47. *SME asserts that this plant will provide a stable, low cost source of electricity. This assertion is assumed to be true in this EIS. But what if the power from the Highwood station is not less expensive but more? I think it is at least very possible that the cost from this plant will be volatile and expensive rather than stable and cheap. The people proposing this plant have not considered the add-ons of a tax on coal generated power or the rising cost of fuel, even to haul the coal, and other raw materials to the site. These things must be considered before we can assume that the power from this plant will be cheap. C77*

Response: SME has informed the agencies that they have considered these factors and it is in their own interest as a consumer-owned cooperative to have done so. That said, in the more distant future, uncertainty affects any and all forecasted prices. These are SME's, not the agencies' assertions, pertaining to the proposed action, although these assertions were derived by analysis using methodologies mandated by RUS to all prospective borrowers and prepared under RUS guidance.

48. *I believe the things we will lose by building this plant are things that are priceless. Things like our Big Sky, the health of ourselves and our children and our children's children, and the viability of our planet to sustain life. C77*

I'm concerned about the unstudied adverse effects on the vegetation, the water, the air, the animals, the entire ecosystem that has a delicate balance. As the previous speaker mentioned that, for my generation, I'm concerned about the seven generations to come. There will be an untold imbalance and a cost to our health, our culture, our plants, medicines, our food, and our way of life. C119

Thank you for the opportunity to comment and may you make a decision which is good for all of Mother Earth's residents. We must preserve this planet for future generations and not allow unmitigated greed to run rampant over us. C125

I have heard about this in the news, and I am extremely upset that a project such as this is even being considered anywhere in the U.S., let alone in the most beautiful, "Last, Best

Place” that there is - Montana. It is also near enough to me to affect me and my family personally, and I do not wish to be more contaminated and unhealthy because of this. C146, C147

Those favoring the coal plant only talk of jobs and furnishing some electrical power. As I understand it would be primarily for businesses. It is too high a price to pay for the health of the citizens of Great Falls and surrounding areas to accept such poor planning on behalf of our city. I shall be extremely disappointed if this plant is accepted on the EIS review with the emissions that it lists for this plant. C171

If we only learn one thing from the fire season in Montana, it's just how precious, prodigious, and priceless our clean, clear blue skies are and just how quickly and easily they are changed and gone. Furthermore, if we truly believe Montana is “The Last, Best Place,” why, then, would we want to bring in pollution equivalent to the emissions of every car, truck, motorcycle and bus in the Seattle area...everyday?...We do not need this plant – not until safeguards are in place to protect and keep clean the Big Sky of Montana! C293

I believe the proposed coal plant is not in our benefit...I think the coal plant will badly impact our environment. C332

The country north and east of here, where I grew up, was pristine when my grandfather homesteaded here, less than 100 years ago. It still has the qualities so much of the rest of this country – the rest of the world, and I have seen it – only longs for in dreams: clean water, air you can breathe, unpolluted ground and Montana's famous skies, a reprieve for the soul....In less than 200 years we – not “we,” but a few big industrial polluters – have turned a green and beautiful land, capable of sustaining all of us, into something like the filthy, grimy country around Pittsburgh. C336

Response: Thank you for your comments. The intent of the EIS and permitting processes is to analyze and minimize the impacts of the proposed action on these important values and the environment that all Montanans cherish.

49. *I oppose the DEQ issuing the above [draft] air quality Permit. Furthermore, I believe the DEIS is flawed, that there should be no ROD issued until the DEIS has been corrected, and finally I oppose the REA, of the US Dept of Agriculture providing guarantees, loans, and moneys for the development of the Highwood station. C78*

The City of Great Falls, Montana, has never permitted its Citizens to vote on whether they want a coal plant business venture in Great Falls, even though it is the taxpayers who may be forced to cover losses in the development and possible operation of the plant. The Cascade County Commissioners have never approved the plant, nor consider its economic and environmental consequences to this region. Others living down wind from this plant have never been involved in the decision-making. Questions put to the city concerning proof of those willing to buy the power and the nature of the contract and the list of public meetings they have submitted to you have never been provided me, although I have requested them. How can citizens be permitted to meaningfully participate in a

process which has been determined without such participation and then when participation is only granted if it supports the city manager's view. C78

Response: Any potential borrower must demonstrate in its loan application the financial viability of the proposal, including the participation of other entities.

50. I feel that our process here in Montana under our requirements constitutionally for a clean and healthful environment have been pulverized by the past administrations. The fact that we no longer have a facility siting act; that we have an air quality permit process, which is backwards; the fact that this is only a procedural method for them and not a substantive method for them means that there's no guarantee in the decision that is going to be made by the Department of Environmental Quality as to whether or not this plant really does affect things. So it can't really do what it should do. This is a failing of our legal system. We don't have adequate measures that you people can follow. C78

In the absence of scrutiny under the Major Facility Siting Act, the duty for performing a robust and independent determination of need for a coal-fired power plant does not go away. Rather, it must instead be carried out in the context of the EIS. C95, C134

Response: The RUS is responsible for and will complete such a determination.

DEQ implements the statutes for which it is responsible. DEQ can make recommendations with regard to resources for which there are no statutory requirements. It is up to the applicant to determine which of those non-statutory mitigation measures they would choose to implement. Changes to this system can only be met through the political process through the state legislature.

51. Why is the Department of Energy not included in this entire assessment, particularly since the US Department of Energy has its own 'Wind Powering America' that could be exploited to fulfill and to complement the USDA's efforts to increase RURAL economic development and protect the environment? C80

Response: Although the U.S. Departments of Agriculture and Energy cooperate on other types of energy-related programs and initiatives, including a recent national conference on renewable energy, the DOE does not have a financial, programmatic or procedural connection to the Highwood proposal. However, as noted in another response, SME has been notified by the IRS that it was approved for financing for its wind turbines under the Clean Renewable Energy Bonds (CREBS) program.

52. Where are the actual advertisements listed in the Great Falls Tribune, or where they merely legal size notices 'buried' within the daily papers? C80

Response: RUS is required to publish its public notices in the main section of newspapers, rather than the classified, legal or other obscure sections. Both the RUS and DEQ notices were made a part of the public record and included in the public scoping reports. The subject advertisements were copied and incorporated into the reports as an appendix. Also, affidavits by each paper editor are provided

as proof that the subject published notices exist. DEQ issues press releases that the news media may or may not choose to publish or air. These releases are often followed by reporters' inquiries to the agencies and articles that appear in prominent locations.

53. *What 'scoping' was done for citizens outside of the City of Great Falls to get their input, especially when many rural residents, ranchers and farmers already use Northwestern Energy, and where is our right to be heard, as this could effect Northwest Energy's rate structure and service for Cascade County citizens outside the city? C80*

Response: The number and location of scoping meetings is determined by the magnitude of the proposal, the potential area of effect, and population size and distribution. It was determined that one scoping meeting each for the RUS and MDEQ was sufficient.

54. *Why was the civic group, 'Citizens for Clean Energy' denied the 'Right of Assembly' to setup a table – not necessarily in close proximity to SME, ECP and commercial contractors – at 5PM, 27 July 2006 before the 7PM public hearing? C80*

Response: The 27 July 2006 event at the Great Falls Civic Center was a public hearing and open house to provide and receive information, not a political forum. Citizens for Clean Energy members were not denied the right of assembly; their representatives were able to gather petition signatures at the entrance to the building. They were also informed that they could speak to members of the public entering the building but requested not to impede their access. Members were observed gathering petition signatures. This approach is standard procedure at MEPA hearings conducted by DEQ.

55. *Would SME ever purchase coal locally in the old coal-mining area of Stockett, Sand Coulee and Tracy, particularly when an SME official 'speculated' on the possibility? C80*

Response: The coal located in these areas is a high-grade, sub-bituminous or low-grade bituminous coal. SME conducted a very high level review of these reserves as a potential fuel supply and concluded that these reserves are not currently a viable fuel supply option. If a different coal supply was used for HGS, it would likely require a modification to the air quality permit for the project. Furthermore, if the coal supply envisioned for use in the boiler is not at a permitted mine, a full permitting process for a coal mine would be required before the coal could be mined and supplied to HGS.

56. *What impact would occur if the either CFB coal plant site were to be shutdown for regulatory non-compliance or for any other reasons? C80*

Response: DEQ works with permitted sources to resolve issues of non-compliance before resorting to shutdowns. Therefore, this regulatory scenario is possible but highly improbable.

57. *One of the hardest things that we have to focus on in the future is where do we get our energy from. America is growing. Montana is growing. And as we grow, as our kids, our grandkids and all of these people grow, form their own households, they need energy. We need energy to run our computers, power the lights, power the irrigation pumps, which are more efficient use of the land. C83*

Response: Thank you for your comment.

58. *Those who want to see an IGCC plant should introduce this in the State Legislature. We have a few legislators here tonight. Let's introduce some bills to have the State of Montana help fund this. I'm hearing that it's going to cost more. SME customers are my neighbors and I can't tell them to go out and spend more because, you know, there is better technology out there. I'm saying, if the technology tonight [CFB] meets the rules as we have them set up, let's go for it. C83 N*

Response: Thank you for your comment.

59. *The board of SME, which I'm the chairman of at this time, has made every effort to address all of the environmental issues and all other issues, so that we could have the best, latest technology and the lowest cost power we can give to you our people. C90*

The completion of the Highwood Generating Station is vital to the cooperatives involved. C91

SME cooperatives are committed to the goal that this additional generation for Montana will be achieved by using the cleanest coal technology available. C91, C92

Through atmospheric pollution and depletion of natural resources, it is clear that coal-fired power plants such as Highwood impose a significant cost on the environment. It is therefore incumbent upon DEQ and RUS to perform a thorough analysis of the impacts of the proposed project, and to meaningfully investigate alternative methods for accomplishing the purposes of the plant. This process should be guided not only by the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA), but also the Montana Constitution -- a document which explicitly recognizes the right to a "clean and healthful environment" and a corresponding duty to "maintain and improve a clean and healthful environment in Montana for present and future generations." (Article II, Section 3 and Article IX, Section 1). C95, C134

Response: The analyses required by NEPA and MEPA must be in compliance with and/or integrate all applicable environmental laws and regulations. NEPA itself includes the Congressional declaration that "... it is the continuing policy of the Federal Government, in cooperation with State and local governments ... to use all practical means and measures, including financial and technical assistance, in a

manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.”

60. *In the absence of scrutiny under the Major Facility Siting Act, the duty for performing a robust and independent determination of need for a coal-fired power plant does not go away. Rather, it must instead be carried out in the context of the EIS. C95, C134*

Response: The RUS is responsible for and will complete such a determination and this is addressed in the EIS.

61. *Due to the unacceptable large threat the Highwood project poses to public health, the natural environment, and the quality of life in Montana, and due to the absence of a need for a facility of this size and also the availability of other cost-effective options that cause far less pollution, MEIC stands in strong opposition to the Highwood Generating Station as currently proposed. MEIC finds the DEIS to be fundamentally flawed in its analysis of need, impacts and alternatives, falling far short of the requirements of NEPA and MEPA. The decision to grant an air quality permit to the plant as currently configured would also contradict both the spirit and letter of Montana's Constitution. Finally, a decision by USDA to provide financing (with federal tax dollars) for a speculative project designed to produce power far in excess of the actual needs of the rural electric cooperative members of SME would violate the boundaries of the Rural Development Program. There is simply too much at stake to allow this faulty project to proceed. C95, C134*

Response: The DEIS and FEIS adequately address the need, alternatives, and impacts of the proposal. Discussion of alternatives is expanded in the FEIS, in particular, detail has been added to the IGCC option. USDA-RD, in its evaluation and approval of the loan application, has determined that the proposal meets the requirements of its program. In addition, any air quality permit will comply with all standards, and the plant will be required to meet the recent mercury regulations adopted by the Montana Board of Environmental Review.

62. *You're talking about a really clean plant. SME has done a great job with their moving beyond what they really needed to in some instances of the development. The Department of Environmental Quality has done a great job trying to look at everything. EIS, they have to consider the social and economic impacts, as well as the impacts to the environment. They have to look at the global requirements. And they're doing that. C96*

Response: Thank you for your comment.

63. *It is true Montana has a large deposit of coal, but let the companies that want to use that coal do it in manner that will not pollute our environment. Yes that might cost a lot of money now, but what about the cost of our health and the cost of any future 'clean up' if necessary because of short cuts use today. C100*

Response: Thank you for your comment.

64. *I represent the North Central Montana Building and Construction Trades. And I know what everybody is saying, oh, God, here's the union guy up there, because they want to build a plant. Yeah, we do want to build a plant. We built the Colstrip back in the '70s and '80s. We built a lot of other projects around the country. A lot of them are not as environmentally friendly as what we have in this kind of plant. And that's a good thing, because we're putting on a plant that is better and more technology advanced than what we used to do. We progress. That's what we do as a nation and as a people. C103*

Response: Thank you for your comment.

65. *In the August Issue of Rural Montana Magazine, Dave Wheelihan, CEO of the Montana Electric Cooperatives' Association, had an article praising the fact that Congress has initiated a resolution that requires that 25% of the nation's energy needs come from renewable sources by 2025. Currently, most of our power comes from Bonneville Power and it is hydro-power which is renewable. It appears that we are going from almost 100% renewable power to almost 100% non-renewable power from a coal fired generation plant for almost a third of the State's area. It doesn't seem prudent to back pedal to the minimum renewable requirements, when we are currently meeting and exceeding expectations with reliable, renewable power. C104*

Response: 'Energy portfolio' standards have been mandated in several states, including Montana, but not at the national level. A central element of the purpose and need for the Highwood proposal is that a current contract with Bonneville Power will be terminated in part in 2008 with complete termination in 2011. SME will continue to purchase a portion of its power from the Western Area Power Administration, whose supply relies heavily on hydropower. Also, SME will install 6 MW of windpower. Again, this is stated in detail in the DEIS and carried over to the FEIS.

66. *Cost of power to the consumer needs to be the overriding factor considered in the decision to build and operate a new power plant. All costs must be considered including health. C104*

Response: RUS and DEQ do consider health as an important factor in environmental analysis and decision-making, including permitting, and the EIS reflects this.

67. *Where is the information on the environmental impact of the coal mining for this plant? If it proves to be too expensive to ship the coal, are other closer sights an option? Impacts of such places should also be part of this document. C105*

Response: The impacts of coal mining at the specific mines likely to provide coal to the HGS were assessed in earlier EISs conducted by the federal and state governments for those mining operations. These assessments were incorporated by reference in the DEIS and the FEIS.

68. *You've left a huge job, the way the system apparently works, to have citizens to go through this 700 page document and find all of the errors, misinformation, and shortcomings. For those of you that are hired to do this and don't have the other jobs that we have to do this on the fly, I encourage you to look at it in deep detail. C105*

Response: Thank you for your comment.

69. *I have very mixed feelings about the Highwood Station. I am extremely disappointed that SME has opted to depend nearly entirely on a coal- fired plant. C106*

Response: Thank you for your comment.

70. *One thing caught my eye going through it. On the no-action alternative in just about every spot, on the conclusion it would be to the extent that other generation sources may be pre-existing and under the purview of older and less stringent safety and emissions regulations. The no-action alternative could potentially be contributing to greater regional impacts on human health and safety. Now, many people I've seen up here tonight laugh this off with a wave. I know what it is to have hard work being not appreciated. And I want you folks to know that we appreciate everything that you've done with this. And we look forward to building the plant. C107*

Response: Thank you for your comment.

71. *Let the electric city do without coal or gas fired generation. In light of today's knowledge of alternative means of generation and of global warming , let us not add to it in old fashioned ways. Lets help by using clean new technology of solar and wind. We don't need to produce sulfur emitting, CO2 emitting , native prairie digging , railroad fuel burning ,coal fired electricity. Right now Sletten construction Co. is building a 40 acre 6 megawatt solar generating facility in Nevada. coupled with wind power Great Falls could produce more megawatts of clean power. I think the coal facility is a short sighted development. I will fight it. C109*

Response: Thank you for your comment.

72. *I hope that this process of commenting on the DEIS will actually be meaningful. I hope that this ridiculous, ill-conceived, possibly illegal and even dangerous project is not a fait accompli, as it seems. I hope that the will of the people in this country still counts for something. I hope that the "powers that be" are able to be far-sighted enough to do what is right, not what is expedient or what they hope will put money in their pockets to the detriment of this community and indeed of this planet. C111*

Response: Thank you for your comment.

73. *I have lived here for 19 years, and I raised my daughter here. I have set my roots down. I am an avid gardener, and while I am probably not an expert, I enjoy learning and my gardens give me a source of joy, relaxation, beauty, and organic produce. I thought you might enjoy some pictures of what I have going on here. I don't want my gardens polluted by this plant. I want the rains to refresh the nourish my garden, not impair it or render*

my produce I work so hard to raise organically unfit for consumption. I don't want to have to leave Great Falls because this thing is built here. C111

Response: Thank you for your comment.

74. *I love the Great Falls area. And one of the aspects of life here that I love so dearly is the clean area, the clean water, the friendly people, the opportunity to hike and enjoy this wonderful outdoor life that I had denied to me when I lived in the northeast. C112*

Response: Thank you for your comment.

75. *I think we're being very short-sighted in even considering this plant for development here in this region that we love so dearly. Why do we want this here? I don't know if any of our members of our city counsel is here or our mayor is still here. I guess my question is why aren't you protecting us from this. I think it's very clear that those who are speaking in favor of this are those who have an economic interest or those in the industry itself. I have heard no one here really that wasn't in one of those two categories. C112*

The idea of the Highwood Power Plant is a cruel and unusual way of putting our lives and the environment in danger just to generate electricity that can be easily done with safer methods. C187

Response: Thank you for your comments.

76. *Rio Tinto Energy America supports economic development in Montana that promotes a healthy environment and is sustainable for the state and its communities. Southern Montana Electric G&T's efforts are protective of the environment by employing clean and proven coal-fired electrical generating technology to address the forthcoming need to replace the baseload electricity generation that will be lost from BPA in the near future. Southern Montana Electric G&T's efforts are forward thinking, providing replacement power critical to the sustainability of the economies of the state and regional communities, creating new jobs and utilizing local energy resources. C114*

Response: Thank you for your comment.

77. *If I, as an individual homeowner and Great Falls resident, won't be able to utilize any of the electricity from this plant, which I have been told that I won't be able to, because I'm not, quote, big business in Great Falls, how is this going to keep my costs competitive? I don't understand that. C117*

Response: Whether or not an individual homeowner and Great Falls resident will be able to purchase from the proposed facility has not been determined. At this point there is every hope that individual homeowners will be able to purchase from the proposed facility; however, that matter ultimately rests with the Montana State Legislature. At this point the City of Great Falls has a "pilot project" underway to demonstrate to the Montana Public Service Commission (PSC) that it has the ability to meet the needs of residential consumers as efficiently as the existing "Default Supplier." If the pilot project is successful it is hoped the Montana State Legislature

will see it is in the best interest of Great Falls electricity customers to expand the ability of the City of Great Falls to serve a broader segment of the electricity customers in Great Falls.

If the City of Great Falls is allowed to serve a broader segment of the electricity customers, it is believed that by participating in HGS, the cost of providing that service will be no greater and perhaps less over time than those customers are paying under existing conditions. The reason there is a potential for cost parity or even a reduction is that, based on the costs paid by Montana electricity customers over the course of the past several years, “cost based” rates which are enjoyed by the members which SME serves, have been lower than the market based rates paid by the customers of NorthWestern Energy (NWE).

78. I'm for jobs. I'm a small businessman here in Great Falls.... I'm for good jobs and good wages. After hearing all of the comments and seeing your proposals, I'm afraid I might vote against this thing. I believe there's a better way. Several ways have been proposed. I hope that my vote counts. Does my vote count? C117

Children are so susceptible and it is unfair to subject them to the fallout from this project. I don't believe they have a vote on it. Do I? C284

Response: Voting is not part of the NEPA/MEPA processes.

79. What concerns me is the potential for impacts to become significant. I think time is an important element that has to be addressed. People are in a great hurry always to make money. People are in a great hurry to meet needs. People are in a great hurry when they have a project they've worked very hard on and want to do it. And many of the things that are adverse in the environment, or potentially adverse in the environment, take years to develop, take lifetimes to develop, take a long time to develop, and I think that that needs to be remembered when addressing an issue of this magnitude. C118

Response: The DEIS addresses potential impacts extending over the life of the plant and beyond, described in Section 4.2.1, where “duration” is defined as a criterion.

80. I'm opposed to this coal-fired plant, and I'm not satisfied with the draft environmental impact statement. I would like to see hard evidence from the tribal elders, the tribal community, the grass roots people who reside in that area of north central Montana. And until they endorse this plant, I will continue to object and express my opinion. C119

Response: Tribal leaders have no authority regarding approval or permitting of the project but they, like other citizens, have the right to comment on the adequacy of the EIS and mitigation measures.

81. It's been said that Montana is the last best place. We can see that by the population increase. It's not only Montana, it's the whole northwest United States. In order to accommodate this, there's going to have to be an increase in generation throughout the area, and we can see this by the competition for the cheap power that is available. C120

We have SME here. We have Montanans looking out for Montanans. They're not out to pillage the land. They're out to provide low cost power to the members. And they're not out for the mighty dollar, like I've heard here tonight by several people. I've worked for a lot of these co-ops, and I can tell you that they are not for profit, and run mostly, by the large part, by conservative farmers and ranchers throughout the State of Montana, and they're just looking out for the best interest of the neighbors. C120

Response: Thank you for your comments.

82. *I am very concerned about the proposed Highwood coal-fired power plant and the thousands of tons of toxic pollutants it would send into the air, endangering the health of all living beings in a far reach around it and adding significantly to global warming, if it were to be approved. C124, C127, C137, C297*

Response: If approved, the air quality permit would limit emissions of air pollutants to levels considered protective of human health and the environment. While CO₂ is not currently regulated, SME has asserted that it is developing mitigation measures that could offset a portion of its CO₂ emissions. Refer to Category Code AIR-603 for additional responses to public comments

83. *We are very concerned about the Highwood Power Plant as it is proposed in the draft EIS. As residents of Great Falls we find no compelling reasons to build this facility. It also seems that some fairly serious omissions from the draft EIS prevent a correctly comprehensive view of the project. Please do not go forward with the plans as they exist in this draft EIS. They are incomplete and irresponsible. There are better ways to provide power, create jobs and generate revenue in this region of Montana without polluting our air, rivers and environment. This is not an either/or proposition and shouldn't be treated as such. C126*

Response: Thank you for your comment.

84. *This letter is written in protest of the proposed Highwood coal plant being built by SME. This letter will surely fall on "deaf ears" since your department seems bent on building this albatross. Our children will wish we hadn't built it and will have to undue our damage. It will be your legacy having your fingerprint on this smoking gun. My conscience will be clear since I am doing all I can do at a citizen level. C127*

Response: Thank you for your comment.

85. *On page ES-10 and throughout the DEIS, the "Lewis and Clark staging historic site" and various other descriptions of the interpretive site on Salem Road are used. SME suggests that the description of the site be consistent throughout the document based on the name of the site on the entry sign as follows: "Portage Staging Area." C128*

Response: This correction has been made in the final EIS.

86. *In Section 4.4.5, under mitigation measures there is a provision that "construction activities in or adjacent to the Missouri River may be limited to times when spawning,*

nesting, or breeding of aquatic and/or wetlands species is not occurring." At this time SME does not agree as a mitigation measure to limit its construction under these parameters since there is no limitation as to types of species, places that activities are taking place, or their duration. SME will comply with all necessary permitting requirements. C128

SME is willing to consider taking certain voluntary mitigation measures regarding the adverse impacts of the project. However, SME reserves the right to agree or disagree with such mitigation measures as part of the final EIS and Record of Decision for the project. The recitation of such mitigation measures in the DEIS does not necessarily indicate SME's agreement to undertake them. C128

Response: Specific mitigation measures are discussed and recommended in the EIS regardless of authority to impose these measures, and requirements for implementing some mitigations, such as those for historic resources, will be negotiated prior to the Record of Decision according to Federal policy. DEQ cannot impose mitigations for which it has no regulatory authority unless a permit or license applicant requests that those mitigations be added to the permit or license. Other permitting agencies may use the final EIS in their decision-making, such as the Army Corps of Engineers in its 404 permitting process, and may impose some or none of the mitigation measures that neither RUS nor DEQ have the authority to require. More detail is being added to the mitigation measures to make them less open-ended.

87. At the end of the day what we will have is a facility that the State of Montana and Rural Utilities Services can be proud of as exemplary of the ability of the utility to use control technology to maximize its efforts to control pollutions from this facility. C128

Response: Thank you for your comment.

88. I just like to let you know that I read about this in the Tribune yesterday or a couple of days ago. I don't remember. But my wife threw the announcement away, and I don't remember where it was when we had it in Havre. So I went to the Havre Daily News. They did not know about this meeting. I called the radio station. They did not know about it. Okay. You are all federal employees, and part of the NEPA process is that you have to post notice of these public meetings and the environmental documents, that's a public meeting. So those meetings weren't posted, okay. C129

Response: Notice of the public hearing in Havre was posted in locally available media and announced at the Great Falls hearing two weeks before. In addition, a news release was sent to the Havre Daily News.

89. As a consumer of electrical energy from Fergus Electric Cooperative, Inc., beginning in the latter 1930s, I have watched it operate and know it to be a responsible organization, concerned about its environment and with the welfare of those it serves. Its current board and management are continuing in that direction, and will ultimately be shown to be very responsible in addressing their duties. C130

Each of us needs to be responsible stewards of our environment. Science no longer argues with whether or not our environment is troubled by excessive emissions. It clearly is. Thus, like other responsible citizens, Southern Montana Electric G&T was compelled to find the best solution it could without simply curtailing and limiting its members' source of electrical energy unreasonably. Like all other human activities, it will have some negative impact; this must be held to a minimum. C130

Response: Thank you for your comment.

90. *My reading of the published DEIS tells me that it is a reasonable, accurate reflection of the facts as they exist. The members of Southern Montana Electric must replace power they are now receiving from Bonneville Power Administration by the year 2011. It cannot do this with hydroelectric power nor with wind power alone. As a result, the most feasible and workable solution to this dilemma appears to be that which Southern Montana Electric has developed, a coal fired generating plant with the most recent and cleanest technology of proven reliability. This, coupled with the wind power being proposed to supplement it, will be cleaner than any other reliable source actually available to the consumers of Southern Montana Electric. C130*

Response: Thank you for your comment.

91. *We moved to Montana in 1955 because we wanted to hunt and fish and hike. In those days we lived on Flathead Lake, and believe it or not, our pipe that came into the house went straight into Flathead Lake, and it had a screen on it to keep the critters out. We didn't have any treated water at all. This is 50 years later. Doesn't that sound like a fairytale? We have to filter our water. We can't eat the fish because of the mercury. And it's up to the DEQ, to prevent any further degradation of the air and the water by denying the air quality permit and preventing any mercury from entering our air and water. It's time for us to recognize that our human health is more important than money. C132*

Response: DEQ must respond to air quality permit applications and determine if permit limits, including those on mercury, can be established that are protective of human health and the environment. If so, then DEQ is authorized to issue the permit.

92. *All I know about this situation is there's five co-ops that are trying to take care of the people that own those co-ops. These are nonprofit corporations, if you will. So is SME. And what they're trying to do is they're trying to go back to a base of cost-based power. That's what the rest of us in NorthWestern used to have before deregulation went in. Cost-based power is the cost of the plant is plus a very small amount of maintenance, that's what they give it to their members for. There's no profit. It's what we used to have with NorthWestern. It was what the cost was with NorthWestern, plus some profit, and then it was sold to the rate payers. This is the thing that we have always wanted to have since 1997. This is the thing in Montana that we lost as NorthWestern consumers. This is a bunch of co-ops trying to take care of their people with the lowest cost of energy they can provide. C133*

Response: Thank you for your comment.

93. *Unfortunately, a number of air quality rules and standards have been changed by industry lobbying so that old plants don't need to be retrofitted or updated, and new plants of the old types of Pulverized Coal (PC) and Circulating Fluidized Bed (CFB) generating facilities are still being planned and built - often with subsidies, low-interest loans, and the active participation of agencies such as the Rural Utilities Services (RUS). C134*

Response: In accordance with the requirements of the Administrative Rules of Montana, an existing emitting unit is not required to retrofit or update existing equipment or emission controls until such time as the affected unit is modified. Modification of the affected unit would subject the unit to current day operating and pollution control standards including, but not limited to, the use of best available control technology (BACT). This ensures that air quality is not significantly degraded from the modification of sources of air pollution and that any modified industrial source will be as clean as possible and that advances in pollution control will occur concurrently with industrial modification. Further, current day circulating fluidized bed (CFB) and/or pulverized coal (PC) boiler technologies are recognized world-wide as state-of-the-art coal combustion technologies for the production of steam and electricity for utility application.

94. *We anticipate that all these agencies and standards will be reformed during the next few years to reflect the full costs of global warming and the health effects of pollutants such as mercury, lead, small particulates, Nitrous Oxide, Sulfur Dioxide, etc. It has become a political imperative, embraced by all parties and not to be denied by a few oil and coal companies which dominate the present Administration. When that happens, those who did not participate in the coal boom, nor invested heavily in these discredited technologies will prosper, while those who've spent decades worth of energy investments in coal plants such as the Highwood Station, will see their investments lost, in whole or in part. C134*

Response: The direction of future regulation and investment in energy technologies is speculative and outside the scope of this EIS.

95. *We, the members of Citizens for Clean Energy and a thousand or more petitioners from this area respectfully request that you deny the permit for the Highwood Generating Station, refuse to fund or otherwise support the SME co-ops group in this plan, and start the whole process over with a public and scientifically reputable study of the future energy needs of this region, with due consideration for the property and legal status of those who already live and work here, and for those who presently supply us with our energy needs. We are also in touch with federal investigators who will carefully examine the business plans and transactions of the various parties involved for evidence of fraud, deceit, or corruption. C134*

It appears that the Schweitzer administration is simply giving lip service to its stated priority of expanding energy development while protecting Montana's precious environment. I actually believed that the Schweitzer administration would be different from the long string of Republican administrations that took pride in being the "lapdogs

of industry.” Millions of Americans are waiting for change, for courageous leadership, for responsible leaders with vision and foresight. Our neighbor to the west, the state of Idaho, has taken a big step in the right direction by pledging not to build any new coal-fired facilities. The very least we can do is insist on the very cleanest technology and put forth a genuine effort to expand renewable energy in Montana. This permitting action is a shortsighted, unethical step backward. Please start over and do what is right. C135

Response: RUS and DEQ have followed their respective NEPA/MEPA processes and procedures. They cannot deny funding and permitting on the basis of public opinion. The EIS was completed using a scientific, interdisciplinary approach.

96. I find it somewhat ironic that the people in Great Falls are condemning a plant here that would produce energy for some of us co-ops down in eastern and central Montana and suffering the ill-effects from that, when we have been in down wind and supposedly the ill-effects of Colstrip have been affecting us, and they've been using that power here to generate for their homes. C139

Response: Thank you for your comment.

97. I was shocked in June when I first heard that Montana was proposing to build an additional coal-fired power plant. It seems that we have not learned from historical data that the addition of mercury and CO2 into the environment is not good for our economy or health over the long term. With today's articles on global warming and mercury accumulation in food supplies, it is interesting that we citizens of Montana would even consider building a new plant without implementing the best pollution controls available. C147

The Highwood facility is, at best, a seriously misguided attempt to stimulate anything good for the citizens and state of Montana. This day and age, our knowledge and experience tell us that burning coal for electricity has become a very poor choice, given the options. We know better, and should be doing better. C149

Response: A Best Available Control Technology (BACT) analysis was performed as part of the air quality permit application and DEQ determined that the pollution controls being implemented at the proposed HGS do indeed constitute BACT. All reasonable alternatives were analyzed for their viability.

98. My husband and I bought a house in Great Falls a little over a year ago, and we were attempting to find quality of life here. And I believe we found it. I came from Las Vegas. Before I came here I researched this town, and I found out that it had clean air and clean water. And that's what we were looking for. And the American Lung Association ranked our area fourth highest in their clean air study. I left a highly polluted area. And if this community gets like this, those of us who have moved here for quality of life will be moving out. Because we came here and we brought financial gain to this community. So all of the power that people are concerned about supplying to Montana because of the growth, I don't think they'll have to worry about it anymore. If they screw this place up too. C150

Geraldine is a small town that would be directly affected by the coal plant and the emissions that it would produce. This town has been in existence since the early 1900s we have seen many things happened and many changes made; we have struggled with water issues and financial issues, and we still have made it to this point. The residents of this town do not need a new threat to struggle with. C316

Response: Thank you for your comments. The aim of the air quality permit is to prevent degradation of air quality in Great Falls and areas downwind, including Geraldine.

PUR-200 PURPOSE AND NEED

1. *Some people questioning the project purpose and need have talked about the HGS electrical service being exported to Wyoming. We do have a few residential customers, irrigation customers in northern Wyoming; but, to my knowledge, we're the only co-op [Beartooth Electric] in SME that even serves across the state line in Wyoming. C7*

Response: Thank you for your comment.

2. *Those questioning the need for the project comment that SME could not possibly have that kind of growth in our systems. Our systems have been traditionally rural... while the cities may not be growing, everybody is coming out to buy their piece of Montana. And our growth factors, as far as our load, is growing much quicker than the northwestern territory's growing as far as residential load...there's just an awful lot of residential development in our area. C7*

Response: Chapter 1 of the DEIS discusses these factors that are helping to spur residential growth within the SME service area.

3. *There's a very important need for firm power from a proven technology, and our people rely on it for their lives, for the health of their livestock and for their economic well-being as well. C7, C40*

SME needs base-load generation to replace power that we have purchased from BPA in the past and will lose in the near future. This is a fact no one can dispute. SME has done the best it can to address this problem. C39

The issue is affordable, reliable power, a necessary commodity for the people who are going to be relying on this for a source of their power. The fact is that the co-ops start running out of their power two or three years from now. And they're completely out of that power from the Bonneville grid in 2011. C52

What is Southern Montana Electric G&T? My answer to this question is Southern Montana G&T supplies power to co-ops which represent people from the Geyser area to the Broadus area, from Winifred to the Red Lodge area. These people live on farms, ranches, subdivisions and several small towns. Power is also supplied to the City of Great Falls, military sites, small businesses and several industrial loads. These people need safe, reliable, cost effective power. And the Highwood Generating Station would provide that power. C39

Our members [of Fergus Electric] need this clean, reliable, affordable power provided to them in the lifestyle we like to enjoy here in Montana. C40

The agricultural community is our largest load and the bread and butter of the cooperative. In my 20 years of employment with Fergus Electric, I've seen a significant decrease in the number of small farm and ranch operations. The reason for this decrease

can be attributed to one major factor: The cost of production from increased property taxes, equipment expenses, fuel, fertilizer and other operating costs. The electrical power purchase is also a significant expense for the small operator. C42

We need dependable electricity to pump water to irrigate pinto beans, corn, alfalfa, beef cattle, barley. We've got to have this power 24 hours a day, not just when the wind blows. We've got to have it all the time, in the wintertime, every minute of every day, all year round. C57

We have a real need. We're going to lose our power source in 2011. We're trying to build a power plant that will be environmentally friendly, that will be staffed by Montanans. We would like to have it be provided with Montanan coal, which is our goal. And we think it is helpful for the economy in our area, and it's also helpful for the economy here. C140

Why are we here today? We're not here because we thought we could make a huge amount of profit by building this power plant. We're here because our power is being cut off. And in 2011 we will not receive power from Bonneville Power Administration. So we don't have the luxury of sitting around deciding what to do. We decided that we had to be proactive and work on this issue and get something on line ahead of time. C159

Our engineers and our staff and our managers have been working on this for four years. So it's not a fly-by-night thing that some of the people seem to think. So the farmers and ranchers in this area rely very heavily on pumps and irrigation, and we need reliable, affordable power. C160

The distribution electric cooperatives involved in the proposed Highwood plant project face the necessity of finding additional power resources due to expiring, non-renewable contracts with federal sources. In short, the search for new power generations sources to serve Montana residents is an absolute necessity. C178

I live at Winifred, Montana, and am a member of the Fergus Electric Co-operative at Lewistown, MT. It is my belief that we are in very dire need of future generation at a reasonable rate. I also believe that the Highwood Station will fill that need. C296

This plant will not be built for "build it and they will come" customers. It will be used to satisfy a need among 5 coops and the City of Great Falls. The coops' supply electricity will end in 2010. HGS will provide an uninterrupted cost based supply of electricity in 2011. The City's portion will provide a power source currently provided by another generator. C306

I fully understand the need for a new and consistent generating facility. The aftershock of the State of Montana's decision to deregulate electricity has been devastating not only to consumers, but also to local governments, school districts and businesses large and small. Utility rates have increased 60% in less than six years. C315

Response: Thank you for your comments.

Chapters 1 and 2 of the DEIS discuss the need for a reliable source of base load power for SME's customers.

4. *It has become evident that the proposed plant is NOT about increased power demand in the immediate area but its primary purpose is to export power, i.e. serve as a merchant plant, for the profit of a few stakeholders. C8, C16, C20, C50, C56, C60, C72, C86, C95, C123, C124, C134, C135, C233, C333*

The five co-ops which remain associated with SME are centered around the coal fields and generating plants near Decker and Colstrip, Montana. These co-op members have already suffered from the effects of large-scale coal-fired power plants, and we who live in or near Great Falls object to them attempting to spread this same environmental desecration to our local environment. Very few co-op members in the Great Falls area will use any of this power, and it remains an open question whether or not the City of Great Falls will be able to sell any of their power to local residents, who are presently being supplied by Northwestern Energy as the default provider. The HGS has all the marks of a "merchant plant," which will export half or more of its generating capacity out of state or to Canada, which has a much denser population just north of the border in Alberta and Saskatchewan. C134

Of the 57 average megawatts of SME's energy demand in 2004, 20 aMW came from WAPA (a contract that is in no real jeopardy of expiring), leaving no more than 37 aMW that could have come from BPA that year. So, from an energy standpoint, SME has proposed a 250 aMW solution to a 37 aMW problem. These numbers mean that SME will have to find a market for up to 213 aMW of energy. Even under SME's ambitious growth forecasts reflected in Table 1-2, the utility would still need just 930,617 megawatt-hours (106 aMW) in the year 2018. In other words, more than half of the energy produced by Highwood would have to be disposed of elsewhere. With so much electricity being sold off-system, this plant begins to look more and more like a "merchant" facility and it becomes more and more inappropriate for the plant to receive its primary project financing through the Rural Utility Service. C95, C134

Is it within the mission of the RUS to fund a merchant power plant? C20

Response: A loan application would not be accepted by the RUS if the financial, forecast and technical data indicated a "merchant" facility. SME is forbidden by law as an electrical cooperative from entering the competitive supply market. The load numbers quoted in this comment are significantly at variance with the current and projected load numbers contained in RUS-required studies performed by SME. Those numbers are summarized in chapters 1 and 2 of the DEIS and are repeated in the FEIS.

Use of "average system demand" to address Southern Montana Electric G&T's need for a baseload generation resource is not appropriate. Based on demonstrated

electricity supply market volatility in the region, developing the “capacity” component of a power supply portfolio with the sole intent of covering “average demand” would have dire financial consequences. It would be very risky to accept exposure to the market for the difference between average demand and the actual demand required to meet member needs. It would also be a poor economic decision to build a baseload resource that is only capable of covering the average system demand and then build an additional peaking resource when the cooperative members are experiencing steady and significant load growth. Under this scenario, the power supplier would soon be in a position where it would have to rely on peaking resource (the most expensive source in a supply portfolio) to cover base load requirements. Additionally, the cost to build both types of generation would be substantially higher than the economies of scale of building a single base load facility.

5. *In Section 1.4.4, the projected energy deficit in 2012 is 160MW. So why is a 250MW power plant being proposed? There is no treatment of this discrepancy in the conclusion. Even with the expiration of BPA and WAPA contracts, contracts with other new suppliers could easily accommodate the modest and incremental increases in demand if the energy industry in SE Montana can develop self-sufficiency for their needs. C10, C165*

The primary justification for this plant is to replace the power that has been supplied by the Bonneville Power Administration to the five member co-ops. The 250 MW output is nearly twice the current peak demand of all the five member co-ops. To sell the excess power generated, the SME has tried to replace NorthWestern Energy as the default supplier to Great Falls. This move (HB 642) has been denied by the Montana State Legislature. If the scale of the plant were reduced to serve the realistic current need and anticipated growth of the five member co-ops, at least a 30% reduction in its environmental impact should be achievable. C12

It is my opinion that the plant is grossly over sized. The 250 MW of power requested is 2.5 times the amount they have ever used from Bonneville Power. Considering the other facilities similar to this being proposed around the west it becomes apparent that SME is a pawn in the coal companies efforts to get a number of these plants pushed thru now, because in 10 years no facility like this would get off the drafting table. C30, C59, C86

The DEIS fails to convincingly establish a need for 250 megawatts of coal-fired electricity production, and relies too heavily on information provided by SME. There are two ways to look at need -- one is total energy consumption (the total number of megawatt-hours needed in a year) and the other is peak power demand (the greatest number of megawatts needed on an instantaneous basis, i.e., for short periods of time). Both must be considered, but the DEIS does a poor job of making the distinction clear. Based upon the energy requirements of SME's member co-ops, a plant of this size clearly is not needed. C95, C134, C164

Even when looking at peak demand, the project still appears grossly oversized. According to information provided to MEIC by SME in June 2006, SME's customers

(including the City of Great Falls and industrial accounts) had an all-time high peak demand of 141 MW in February 2006. This is still only 56% of the 250 MW output of the proposed plant. C95, C134

This plant is not the answer for the Coops that need the power, for one thing the Coops will use only 1/5 of the power this plant puts out. Why build a plant this size? C292

The 5 Co-ops that are sponsoring the Highwood Generator proposal currently use around 500,000 megawatt-hours to supply their customers. The proposal calls for a plant output of 2 million megawatt-hours. Please be specific in your analysis of how this energy will be used, by whom and what price will these customers be paying for this large amount of excess energy, especially during off-peak hours when everybody else is selling cheap as well. C294

Our investigations lead us to question the need...it will produce four times as much power as the co-ops can sell to their customers. So, Montanans must breathe the consequences of yet another make-a-profit-by-exporting-our-resources scheme. That's not a need...it's a greed. C297

The purpose and need statement is arbitrary and capricious. It does not adequately analyze the economics of the proposed pulverized coal generating system. The assumptions used to justify the purpose and need are not supported by historical data and reasonable projections. The potential users of the power from the plant will not need 250 MW in the foreseeable future and perhaps not at all in the lifetime of the plant. C303

Why do we need another coal fired plant when it created so much pollution and is only 1/4 needed & necessary? Just say no! C309

Response: See prior response regarding the load analyses. Information at the beginning of Section 1.4 of the DEIS and FEIS, particularly Table 1-1, illustrates actual and estimated system requirements through 2018. These figures do not include projected requirements for the City of Great Falls. Additional data for 2006 are included in the FEIS to support the estimated requirements. In December 2005, the City of Great Falls (City) retained the services of R.W. Beck, Inc. (RW Beck) to analyze the power needs of the Great Falls metropolitan area. In its analysis RW Beck concluded that the existing load in Great Falls may be well in excess of 100 mW. The City is currently a 25 percent participant in HGS with a corresponding right/obligation to purchase approximately 65 megawatts (MW) of the production of HGS.

The City has been a purchasing member of Southern Montana Electric G&T since October 2004 and it has continued to expand its power supply responsibility from meeting its own needs to include the power supply requirements of a number of local businesses. In addition to meeting the energy needs of traditional municipal functions such as potable water treatment and distribution, street lighting, waste water treatment, and other related city services, the City also serves the hospitals,

schools, international airport, Fed Ex distribution center, Montana Air National Guard, General Mills, Meadow Gold Dairy, and the Montana Refining Company. During the month of July the City had a peak load of 23, 595 kW (24 MW) and sold 11,761,483 kWh. This demand and energy requirement translates to a load factor of approximately 67%. The City has a long history of providing traditional municipal services to the Great Falls community and is well on its way to subscribing its portion of HGS with solid contractual obligations. The terms of these power purchase agreements are in line with the debt service associated with its share of HGS. Based on our understanding of the power supply situation in Great Falls, the City will fully subscribe its rights to HGS.

The demand forecasts and in turn purpose and need for the proposal have been demonstrated and accepted as part of the loan application process.

6. *It stands to reason that the expected overproduction is intended to feed profits to the operators of the HGS facility. Most of the operators are public entities, local governments, co-ops etc., which seem to have an eye on making lots of money. I would question if that is the role of public entities. C10*

The purpose of SME and all other electric cooperatives is to provide reliable, cost-based electricity to their members. By their nature and incorporation under IRS regulations, cooperatives and the City of Great Falls are non-profit organizations.

7. *The primary justification for this plant is to replace the power that has been supplied by the Bonneville Power Administration to the five member co-ops. The 250 MW output is nearly twice the current peak demand of all the five member co-ops. To sell the excess power generated, the SME has tried to replace NorthWestern Energy as the default supplier to Great Falls. This move (HB 642) has been denied by the Montana State Legislature. If the scale of the plant were reduced to serve the realistic current need and anticipated growth of the five member co-ops, at least a 30% reduction in its environmental impact should be achievable. C12*

Response: Under Montana state law (MCA 69-8-103), electric cooperatives cannot act as “default electricity suppliers”. Only investor-owned utilities, such as NorthWestern Energy, can act as “default suppliers”.

8. *The entire premise that SME needs to build a coal plant to prevent “the lights from going out in SE Montana” is untrue. The “Due Diligence” studies required for a loan of this type would uncover the fact that Mr. Ron Harper, CEO of the billion dollar company known as Basin Electric Cooperative, headquartered in North Dakota, has met with S.M.E. and the Governor of Montana and has offered to sell electricity to S.M.E. at longterm and low electric rates. Basin Electric has also offered to build transmission lines to serve southeastern Montana. The R.U.S. should contact Mr. Ron Harper, CEO of Basin Electric, to verify this offer. C14*

Is it the policy of the R.U.S. to loan monies of this magnitude to a rural utility company that is in turmoil and not in full agreement? Will the R.U.S. request a vote of all the S.M.E. members before allowing such considerable indebtedness? Also will the R.U.S. inquire about the plans of Basin Electric to build an I.G.C.C. plant in the very near future? C14

Will the R.U.S. also please contact Mr. Thomas Huntley, C.E.O. of the Central Montana Electric Cooperative (based in Great Falls) which is a composed of nine smaller cooperatives and find out why they feel that the Highwood Coal Plant is a bad idea and a financially risky plan? C14, C54

Response: RUS's evaluation of a prospective borrower's loan application includes review of the financial and organizational stability of the borrower. The RUS does not poll cooperative members or others regarding loan applications. Power supplied from any Basin Electric power generation facility has the issue of no transmission paths to the SME delivery points. Therefore, any low cost power option opportunity must include the development of transmission infrastructure which adds significant costs to this "low cost" option. Any future proposals by other applicants or cooperatives are evaluated if/when a loan application is submitted.

9. *The draft EIS failed to independently assess the real need for this project and the economic risk of becoming overly dependent on a single fossil-fuel based resource. C17, C108, C61, C85, C87, C116, C209, C210, C212, C213, C214, C215, C216, C217, C218, C219, C220, C221, C222, C223, C224, C225, C226, C227, C228, C229, C230, C231, C232, C233, C234, C235, C236, C237, C238, C239, C240, C241, C242, C243, C244, C245, C246, C247, C252, C253, C278, C282, C285, C286, C295, C300, C305, C310, C312, C319, C330, C334*

Response: The purpose and need was fully evaluated and approved prior to undertaking the DEIS. SME's need is based on their impending loss of BPA's power sales. The alternatives evaluated in Chapter 2 of the EIS, and earlier Alternatives Evaluation Study, included more than just coal-fired sources and also examined economic and financial factors.

10. *The City of Great Falls' historical usage is relatively small (5-8 MW); to help justify building the coal plant the City also hopes to provide long term power contracts to area businesses (totaling approx. 65 MW). What business is going to jeopardize its future by signing 20-30 year contract for power at an unknowable cost? It is far from clear that SME will be successful in providing electricity cheaper than the default supplier with its established hydropower and coal plants and with increasingly abundant wind power coming on line. How can SME prevent these businesses from canceling their contracts? Does the City of Great Falls expect the local taxpayers to subsidize rates to commercial establishments? If the customers are not under contract for 20 years or more, how can anyone be sure there will be customers for the electricity? What will happen if the electric needs of these businesses change due to their own ability to generate their own*

power through solar panels, conservation, or use of fuel cells (as just happened in a Billings hospital)? C20

Response: The City of Great Falls, as Electric City Power, has decided to acquire 25 percent ownership of HGS under separate funding agreements. This electricity would be used for military, industrial, and municipal purposes, not by residents, under current plans. The City would thus not be competing with the default supplier. Any further questions need to be addressed to the City of Great Falls and are outside the scope of this EIS.

11. Is it part of the RUS mission to enable rural cooperatives to get into competition with the default supplier for the electric needs of Great Falls' businesses? C20

Response: By law, SME cannot be the default supplier to Great Falls. Great Falls independently determined to participate in this proposal as part of their power supply options.

It is important to understand that there is a distinction between the use of RUS funds to develop generation capacity to meet the needs of the rural cooperative member systems of Southern Montana Electric G&T and the funds to be separately secured by the City of Great Falls to meet the supply needs of the select number of customers it serves.

The funds the five rural electric cooperative member systems of Southern Montana Electric G&T are seeking from RUS are for the express purpose of securing a 75 percent ownership position in HGS to meet the power supply requirements of the electric consumers they serve in "rural Montana." RUS is not funding the 25 percent share of HGS allocated to the City of Great Falls.

12. Despite the claim that SME's electricity will power Montana farms and ranches, their largest potential commercial growth is to increase the profit margins of developers of natural gas and coal bed methane in Northern Wyoming and SE Montana. Coal bed methane developers have not been traditional allies of agriculture....It is far from clear that these potential customers would leave their present electric supplier, whose generation facilities are much closer to the coal source and who will likely be able to offer more competitive rates than SME. C20

Response: The potential CBM customers cited above are already within the service area of Tongue River and Beartooth Electric Cooperatives. These cooperatives would not be reaching outside of their service area to obtain new customers.

13. It is not clear where and how the excess "off peak" electrical production will be sold, and SME's current assumptions about price for this excess energy appear overly optimistic. C20

Response: RUS considers load forecasts based on industry-standard data and methods and other information in evaluating a proposal's purpose and need, and also reviews the applicant's proposed plans for dispatch of off-peak power. RUS does not dictate to prospective borrowers the composition of its customer base.

Southern Montana Electric G&T has a long tradition of having one of the lowest wholesale power rates in the region and the economic underpinnings for the HGS have been detailed in this EIS. For example, the "default supplier" rates the citizens of Great Falls are currently paying are approximately 60 percent greater than SME member system rates for wholesale power. The economic implications of "off peak" capacity have been considered and are conservative estimates of the ability to dispatch the "off peak" capacity of HGS in the current (and projected) wholesale power supply market.

The average market price for all short-term purchases at the Mid C in 2005 was approximately \$58.10 per MWh. The forecasted cost of power at the Mid C and the estimated price that NorthWestern Energy would charge as the "default supplier" at the time HGS begins commercial operation are expected to be greater than the "all inclusive" estimated cost of production for HGS. SME is able to enter into contracts with regional power supply entities that are willing and able to enter into agreements for reserve capacity sharing, "off peak" sales, and the traditional arrangements necessary to ensure supply reliability.

14. *What happens in the scenario that construction begins but cannot be completed due to cost overruns? Is the RUS prepared to add millions of dollars more to finish this project? While the country has seen dramatic increases in labor and transportation costs and the cost of borrowing capital has risen significantly, the \$515 million price tag for the coal plant construction has remained (unrealistically) stagnant for more than a year (the initial 2004 cost projection was \$470 million). C20*

Response: RUS loan applications consider cost indexing due to the extended nature of a proposal's submittal and overall review.

The use of contingencies in estimating the cost of the project is standard. These contingencies are reviewed with RUS in the application for a loan. If appropriate, periodically in the course of project development the project cost is reviewed. Should there be increases in the project cost, the borrower must provide the additional financial information for RUS review. Therefore, any project cost increases and their financial impacts are known prior to loan approval by RUS.

15. *Furthermore, this coal plant appears to solve a nonexistent problem. Montana is already a net exporter of electricity. C20, C151*

What we're doing with electricity is shipping it out across the United States. How come we're doing that when we need it? C26

Response: The demand forecasts and in turn purpose and need for the proposal have been demonstrated and accepted as part of the loan application process. SME plans to use the majority of its power generation to service its own customers, based on its purpose and need studies.

Marketing of electricity across major regional grids has been common for some time and continues to increase with increased demand (see also sidebar on p. 1-15 of the FEIS). However, HGS is intended as a baseload facility, meant to serve SME's consumers and select customers in the City of Great Falls.

16. *The lights are not going to go out in SE Montana if this coal plant is not built. We have been assured that the Central Montana Electric Power Cooperative would reintegrate SME's customer base, should this coal plant be abandoned. C20, C151*

If the citizens of Great Falls and of southeastern Montana really, really needed this plant, it still should not be built as planned. If it must be coal, it would be imperative for IGCC technology to be considered. But the fact is that we do not need this plant. SME does not need it; there is plenty of power to go around in eastern Montana, but SME split from the other co-ops over this coal plant question. That makes this a false emergency. SME's customers can again be served by the same suppliers that will be serving the other co-op, and probably at lesser rates. C111, C125, C126

Response: Thank you for your comments, which are in general outside the scope of the EIS. With respect to IGCC, see the separate responses elsewhere in this document (Category Code ALT-305). SME's decision to build HGS stems from its inability to secure a cost-effective alternative to market based power supply options.

17. *The City of Great Falls has been supplying affordable electrical energy to the Great Falls community for about three years. And now serves about a 20-megawatt load. In 2003 Northwestern Energy unilaterally cancelled a five-year supply contract with the City of Great Falls and other communities and school districts. This cancellation cost the City of Great Falls approximately a million dollars. At that point securing a reliable, affordable supply of electricity became an important priority of the Great Falls City Commission, and they established the city's municipal supply utility to address that issue. C21, C34*

In 2004 the City of Great Falls became a licensed supplier of electricity by the Montana Public Service Commission, and has continued growing its large customer base ever since. The city anticipates it will have contracts to supply over 65 megawatts by the end of this year. C21, C34

The continued growth, economic development, and prosperity of Great Falls and its residents requires the availability of secure, reliable, and economic supplies of electricity at stable, economical and cost base rates for all residential, commercial, industrial and other electric customers in the city. C21, C34

The R.W. Beck study commissioned by the City estimates the total electric energy load inside the city limits. This study was conducted by professional engineers and finds that the total demand within the City that could potentially be served by Electric City Power to be about 100MW. C34

Response: Thank you for this additional information.

18. *We believe that Section 1.4 of the DEIS substantiates the purpose and need of SME's cooperative member systems and of the City of Great Falls and provides a conservative estimate of the total demand for SME as it works to secure a long-term, stable, and clean source of electricity for its current and future needs. C34*

Response: Thank you for your comment.

19. *The impending loss of access to electricity purchases from Basin and Bonneville Power Association will require Southern Montana Electric to look at other sources for the purchase of electricity for its members. Due to our rural location and the lack of adequate transmission facilities to transport the electricity to our service territory, our members will see an increase cost for the purchase of electricity. Many of the small farming and ranching operations that we serve cannot afford another increase in expenses. They will be forced out of business. C42*

The construction of a member-owned electrical generating facility utilizing Montana people, Montana coal, producing power for Montanans at an affordable price will allow future generations to continue with the agricultural life that is the basis for Montana's economy. We can ill afford to add any further increases and expenses for our agricultural community. I urge you to consider the impacts to our agricultural community, and support the approval and construction of the Highwood generating station. C42

Response: Thank you for your comments.

20. *What is the basis of the City of Great Falls load requirement by 2011 and how is that even possible considering most residents already and most likely remain Northwest Energy customers unless the legislature – and unlikely – would let ECP be the 'default' supplier? C80*

Response: The RW Beck study projected that the total electric energy load inside the city limits could be about 100 MW. However, ECP is not and, under the current Montana law, cannot be the default supplier for residential costumers.

21. *We at Yellowstone Electric Cooperative realize that the only viable option is generating our own power. Montana owned generation serving Montanans. We have at Yellowstone realize that using CFB technology using BACT is the only viable option. And that is IGCC is not financeable. C89*

Response: Thank you for your comment.

22. *At the most basic level, the underlying strategy of meeting peak demand with a baseload generating facility is both unusual and unwise. Coal-fired power plants such as Highwood are designed to run at a constant level near their full capacity. Meeting peak load with a baseload generator puts the utility in the situation of having to sell excess power during all but a few hours each year. A better approach is to use a mix of resources, both baseload and peaking, in order to efficiently respond to variations in load, minimize market transactions, and avoid producing so much excess electricity. Peaking plants, such as some natural gas-fired units and even IGCC plants, are highly dispatchable -- that is, they can "ramp up" and then back down again quickly and efficiently to track the actual load. The DEIS is deficient in having failed to analyze a portfolio of resources, and having failed to independently analyze the economic consequences to SME's customers of the utility continually being "long" in the market. C95, C105, C125, C126, C134*

Response: The load forecasts and the purpose and need for the proposal have demonstrated the requirement for baseload generation along with other power supply resources. The proposed baseload generating facility has the ability to operate at minimum output and can ramp up or down from that minimum level, but at slower rates than peaking plants. Responses to Comment #4 and #13 also address the concerns raised in this comment.

23. *It is unfortunate, given these facts about the Great Falls customer base, that the Highwood developers persist in suggesting the plant will serve 120,000 Montanans. In reality, SME serves only about 65,000 people, but the number is often incorrectly inflated to include the 57,000 residents of Great Falls. (See Endnote #31) Electric City Power does not currently have an authorized pilot program to serve large blocks of residential accounts. Even if it does eventually get authorization from the PSC, customers are unlikely to switch due to the deregulation experience. The DEIS adopts this larger figure without question or qualification (including it on the very first of its 725 pages). C95, C134*

Response: The estimated number of current SME customers is about 69,500. The 120,000 figure represents the potential number of customers that could be served by HGS if the City of Great Falls were to receive legislative authority to supply service to its residents. The FEIS has been modified to reflect this distinction.

24. *SME's service area including portions of 21 Montana counties. According to the U.S. Census Bureau, the combined population of these counties is expected to grow at an average annual rate of only 0.6% for the period 2000-2020. (See Endnote #32) And according to the DEIS, "The average amount of electricity used per residential customer is expected to remain relatively constant to increasing slightly over the course of the next 20 years" (page 1-10). So the disparity cannot be explained away by an expected increase in per capita energy usage. C95, C134*

Response: Methodologies used in U.S. Census Bureau projections and electrical utility load projections may differ. Furthermore, Census Bureau projections, based on a range of reasonable assumptions about fertility, mortality, and migration, can frequently over or understate actual population growth. In July 2006, SME's actual peak demand was 141 MW, approximately 60 percent of the HGS's proposed capacity of 250 MW. Actual peaks observed to date are running above those forecasted by SME 2-3 years ago.

25. *Supposing (as seems reasonable) that SME's growth falls short of its projections, large amounts of electricity would have to be sold "off system" and during "off peak" times when it has less value. SME is assuming it would be paid 85% of the on-peak value for this electricity ("Option 1" page 1-18). Considering that other Montana utilities would be experiencing "off peak" hours at the same time, and that Montana has limited transmission capacity to reach out-of-state markets (page 1-14 acknowledges the "ever-increasing transmission constraints" in the WSCC), this might prove a dangerous assumption. Any such miscalculation could seriously affect the plant's economics. C95, C134*

Response: RUS constantly evaluates the feasibility of the proposal during the loan application process. The prospective borrower's load and off-system sales are reviewed as part of determining the financial validity of the proposal during the loan application process. Responses to Comments #4 and #13 address the concerns raised in this comment. SME has indicated that it intends to have contracts in place which will support the sale of power irrespective of the off peak hours experienced by other utilities.

26. *If 250 Megawatts is even a need, who are those customers? They deserve a right to know what ALL the options for cheaper power could be including renewable packages, and to have input on more options than just the build or no build of this CFB plant. With the present three options how are the customers going to have the full picture of information to make the decision on whether it is in their ultimate interest to buy power from this organization? If the potential customers are residents and potential new home owners, they deserve to know the present day home options for energy independence with renewables and present day technology. C105*

Consider that this coal plant is many times larger than it needs to be. Where are the customers? C77

Response: If there are new residential customers, they would be purchasing their power from the default supplier. If they are within the SME service area, they would purchase from an SME cooperative; if they are within the City of Great Falls, they would purchase electricity from Northwestern, the default supplier. The difference between the current usage and the proposed 250 MW capacity of the HGS represents projected load growth of SME's customers.

As of July 2006, peak load had already reached approximately 60 percent of the projected 250 MW peak load in 2018. Thus, customers appear to be emerging at a rate at least equal to the forecasted growth.

27. *The people in southern Montana have certain needs. The people in northern Montana, who will be downwind, have needs. And we have to address the needs, not only of all of us today and our needs for power in our 4500 square foot houses and other things that we think are part of our lifestyle, those needs are important, but we have to think ahead to further needs. What I would like to have you consider is that there are people of national importance, not just the national parks, but national peoples, first peoples who live to the north of that generating plant, and that needs to be considered too. There's the Fort Belknap Reservation. There's the Rocky Boy Reservation. There's the Blackfeet Reservation. People live in these places. How about the rest of the people who live in Havre? It has to be considered. C118*

Response: The air quality affecting downwind residents was considered in both the air quality permit analysis and the DEIS.

28. *Page 1-8, run-over paragraph, second line. Reference is made to the 2004 R.W. Beck Study. This study should be added to the appendix to the EIS. The City of Great Falls has provided further comments on their load and load forecast under separate cover. C128*

Response: The R.W. Beck study has been placed on the agency websites for access and information.

29. *Page 1-11, third paragraph, sixth line. The sentence starting "Fergus Electric has received a depositby the end of the first quarter 2005" should be updated to reflect that Fergus is currently serving two pumping stations. C128*

Response: The FEIS has been updated to reflect this more current information.

30. *I live right down in the middle of coal bed methane area. And if there was a co-op that was going to serve CBM in Wyoming, it would be Tongue River Electric, and we are not going to. Energy Corp out of Helena will be serving all of that load in Wyoming. In fact, they are serving some of the loads in Montana. So the statement that this was all going to go to Wyoming for CBM development is false. It will not. C139*

Response: Thank you for this information.

31. *When Bonneville power opened up its system for power contracts in eastern Montana, one of the distribution co-ops that I worked with was the first one through the door and acquired a wholesale power contract that extended out to 2020. It starts wrapping down in 2017. The organization that the five distribution co-ops that now consist of Southern, SME, were second through the door. And their wholesale power contract, as been explained many times, starts wrapping down very shortly. C143*

The first co-op that acquired a wholesale power contract with BPA had an allocation for monthly quantity of power, and one month they exceeded that allocation. And for eight days Bonneville went out on the open market and purchased power to fill the requirements set forth in the contract. And those eight days, the co-op paid ten times more than its contracted amount. The amount that they paid rather than \$27 a megawatt went up to \$270 per megawatt. So it cost them half a million dollars for its requirements for a very short period of time. C143

The five co-ops comprising SME cannot afford obviously to be exposed to the undulations to the open market and have very diligently sought solutions to that circumstance. Those four or five co-ops are to be congratulated for their efforts to take care of the needs of the 120,000 Montanans. And it's a fabulous and very well thought out enterprise. C143

Response: Thank you for your comments.

32. *It's time to "just say no." Despite all the efforts thus far in the DEIS, there is no well-substantiated "need" for that much power production, and there is certainly no justification for a facility that consumes so much water and produces so much harmful pollution! C149*

Response: The agencies cannot “just say no” to evaluation of a proposed project but must, by law, proceed through their NEPA/MEPA and permit application review processes. The benefit, purpose and need for the project are disclosed in Chapter 1 of the EIS.

33. *I'm the general manager of Yellowstone Valley Electric Co-op. Our cooperative is the second largest electric cooperative in Montana. We're an owner participant in this project, the coal-fired plant project. We are significantly a growing cooperative. We're growing at about four percent a year. Our demand was 35 megawatts. Now we're at 53 megawatts. We cannot have a plant that relies on capacity issues that are based on average load needs. We need a plant that is based on the actual capacities when we need it. It does not make any sense to build a power plant that only serves 60 to 70 percent of your needs on the market and find replacement power. You need to have a power plant that supplies power when needed. Yes, there will be surplus sales. Every utility that has a coal-fired power plant, base-load generation plant, hydro plant, anything that is base-load generation plant will have surplus sales that they'll have to sell off-peak. That only makes economic sense. C157*

Response: Thank you for your comment.

ALT-300 ALTERNATIVES

1. *The Great Falls area is fortunate in having a number of attractive energy alternatives. Hydroelectric power has been known to locals as a generally acceptable source of energy. In addition we are blessed with reliable sunshine throughout the year. Therefore, solar energy is available. We have a good bit of wind. Why not put some of our most abundant resources to good use? C1, C4, C8, C26, C82, C87, C88, C106, C126, C135, C169, C186, C194, C263, C264, C311, C328*

Even in oil-rich Texas, Austin favors solar and wind power and conservation over fossil fuels....Austin's economy is booming, and because people value our clean environment we have been able to attract many nonpolluting entrepreneurial businesses. With its beautiful setting, clean air, numerous recreational opportunities and educated populace, Great Falls is well positioned to do the same. C265

There are other cleaner alternatives available, please take the time to research them before making a final decision. C301, C302, C308

I am continually frustrated by our government's meager investments in solar and wind power alternatives. C313

Why not consider wind generation as an alternative? C315

There are other more efficient and less polluting ways of generating electricity. Already wind power is being developed. Solar is a largely ignored resource, one which has the least cost once installed, and with its proper development instead of suppression by those interested in culling every dime from out-moded sources, i.e. fossil fuels, the cost would be much further reduced. C325

I am absolutely sure that there are other more positive solutions to address [energy problems] that will not pollute the environment. C329, C333

Please support the conservation and renewable energy industry. Use the vision that you must possess and look to our future generations. C335

We are adopting a 19th century solution to the 21st century global crisis. If we are to survive on this planet, fossil fuel consumption must end. Montana could lead the way in wind & solar energy, & our country – our state – needs clean water, skies, breathable air and unpolluted food sources far more than one more old, dirty, already out-moded fossil fuel plant. C336

Response: Each of the potential energy resources cited here was evaluated in Chapter 2 of the DEIS. The proposed project does include 6 MW of wind power.

2. *The DEIS does not adequately address alternatives to a CFB. The DEIS gives short shift to legitimate alternatives to the CFB plant, and I'm disappointed in the powers that be*

from presenting a CFB plant as the plant to be, justifying backwards instead of exploring viable options in an open forum. C9, C25, C45, C81, C164, C317

The DEIS offers no specific support to demonstrate its conclusion that all of these alternatives dismissed qualify to be eliminated; therefore, SME's conclusion is speculative and open to challenge. Before the proposed CFB plant is approved, convincing justification needs to be provided for the elimination of each of the alternatives listed. C8

The Draft EIS is deficient because it eliminates from detailed consideration many of the alternatives that are available to replace the proposed CFB plant. These alternatives, which are listed in pages ES-3 and ES-4, should have been included in the detailed EIS analysis. For all practical purposes, the EIS is little more than a comparison of the proposed CFB plant to no action. C23, C58

The range of alternatives considered in the DEIS as currently drafted is inadequate for the federal deciders to issue a ROD which would not be "arbitrary and capricious." C78, C303

The DEIS is also deficient in its alternatives analysis, selecting an extremely narrow range of options for serious study. The DEIS unfairly discriminates against both renewable energy and energy efficiency in a number of different ways. First, the document starts with the false assumption that 250 MW of baseload capacity is needed. Second, the DEIS fails to consider the full range of costs and risks associated with the proposed plant. Third, it stacks the deck against wind by using incorrect and outdated information, and contains no utility-specific analysis of efficiency potential (such as the size and cost of the conservation resource). And fourth, it evaluates each alternative according to its ability to meet the alleged "need" entirely on its own, in isolation of all other resources, thereby setting each of them up for failure. C95, C134

One of our main objections to this project is that SME summarily dismissed many much better and more economically sound alternatives to this particular plant, even before this project was unveiled to the public. C111

There are alternatives to the HGS – please consider them. C46, C63, C164, C204, C283, C304

It is immoral in my opinion to propose really another coal-fired power plant in light of the critical need to curb our contributions to the greenhouse gases now and especially when other better alternatives, including renewable options currently in existence and are not even being examined. C77, C80

I have many questions as to why this type of plant is being proposed that will not truly benefit our economy, energy development, health, environment and national heritage. There are sound alternatives – if more thoroughly examined – that would prove feasible

economically and provide Montana and America with a cleaner and affordable energy solution. C80

I believe the DEIS is fatally flawed by its failure to analyze a reasonable range of alternatives. As written, the DEIS explores only two choices, a no action alternative – characterized as a return to the Stone Age – or the construction of the Highwood plant. The DEIS devotes more time to discussing where to site the plant than whether it should be constructed at all. The failure to include alternatives that meet the purpose and need without using coal, such as a combination of energy sources eliminated from consideration altogether, is a blatant violation of NEPA. C166

Now is the time for such minds to be delving into renewable sources of energy, using their gifts to help humanity into the future, not bury us in past mistakes. The backers of this project have dismissed any notion that any other sources of energy are as viable as what they offer, including IGCC technology, without adequate justification for their dismissal. C250

Scientific technology exists to limit mercury and sulfur emissions greater than the current proposal from SME. It defies reason and common sense to build a facility that is less than the best we can do, given the fragile complexion of our planet....To allow this project to be built as it has been proposed is short-sighted, and it is a crime against the citizens of Montana. This coal-fired power plant can be built using technology that allows reliable power and at the same time restricts outrageous pollution of our precious planet. C261

Newer technology is available for more efficient operation and greater reduction of pollutants. C288, C305

Hopefully you will all look very carefully at all the pros and cons of this plant and realize that there are some very good alternative sources that would not endanger our lives. C316

Response: In the DEIS, DEQ and RUS independently analyzed the viability of each alternative in SME's Alternative Evaluation Study submitted to and approved by RUS. In the DEIS, DEQ and RUS added an additional alternative – oil-fired power plants – and the FEIS includes still one more alternative – nuclear power. The DEIS also addressed a number of alternative project components. As a result of RUS and DEQ review, the rationale for elimination of alternatives has been expanded in the FEIS.

3. *A preponderance of evidence establishes IGCC as a superior coal technology; therefore, CFB does not meet the "Best Available Coal Technology (BACT)" test. Thus, appropriate energy production alternatives to the proposed SME-HGS project are to be found either in an IGCC coal plant or in the growing alternative energy market. C8, C124*

Why are you choosing an antiquated, outdated method for your electrical generation when it's cleaner, more healthful and a much better way with IGCC and wind. C48

To address these issues we urge Montana's leaders and utilities to encourage more renewable energy including geothermal power plants and to cease encouraging or approving new coal plant construction in Montana unless the plants employ IGCC technology. At a time when the ministry of energy in Ontario, Canada's most populous province, already has phased out one of the province's five large coal-fired plants with the rest to be closed by early 2009, it does not make sense for Montana to build new coal-fired plants utilizing relatively old technology. C73

The coal plant is not needed. Wind power firmed up by hydro is a much better solution for Great Falls. Wind becomes more viable if regulations related to the flow of electricity on the grid should not favor industry but should allow for real pooling of wind power. If, in spite of better choices, a coal plant will be built, it should use the state-of-the-art IGCC technology. Circulating Fluidized Bed technology is not new or best available technology; it has been around for twenty years. C78

When comparing the environmental impacts of Highwood to those associated with truly clean alternatives like wind, solar, or hydro, there is simply no contest. Even natural gas-fired power plants (such as the 260 MW Montana First Megawatts plant that was proposed for Great Falls back in 2001) release substantially less pollution. Integrated gasification combined cycle (IGCC) is a coal-based technology with much greater operating efficiency than CFB and much lower emissions. IGCC also has lower water requirements, produces less waste, and is capable of capturing carbon dioxide for potential storage. C95, C134

Responsible portfolio planning produces an optimal and diverse mix of resources that complement one another to minimize price, risk, and impact to the natural environment. No one resource should be relied upon to the exclusion of all others. Starting with the real needs of the five co-ops, SME could easily have constructed a balanced, clean energy package that would better protect both its customers and the environment. Instead, the only options the DEIS studied in detail were the Highwood project built in one location, the Highwood project built in another location, and the "no action" alternative. Appropriately-sized and cleaner alternatives should have been carefully studied, including IGCC. Note that Xcel Energy in Colorado recently announced its intention to construct an IGCC facility that would be lower cost for a larger unit with much less pollution. It is unreasonable to continue to suggest that IGCC is not a commercially-available, cost-effective alternative. C95, C134

I object to adding more mercury and carbon dioxide to our environment WHEN OTHER TECHNOLOGIES ARE OR SOON WILL BE AVAILABLE. This is irresponsible and unnecessary. C45, C264, C284

Why have our regulatory agencies not held to the top-of-the-line on the use of the cleanest technologies? The answer seems to be that the law sets minimum standards that

allow dirty, polluting coal burning electrical generating plants. The answer seems to be it will cost more. Well, the cost of the plant will be miniscule to the cost of losses due to the impact of particulate matter and polluting matter on people, soil, water, and air. Why does government insist on the lowest common denominator when it is people's quality of life? C168

If we are going to use our coal to generate electricity, then it should be used with good conscience and the most modern technology. Do not lock us into a 20 year old antiquated CFB system when IGCC is clearly the preferable alternative. C262

Response: The HGS would be a 'new source' under DEQ regulations for prevention of significant deterioration of air quality (PSD), and therefore as part of its required air quality permits, would be subject to a best available control technology (BACT) analysis. Meeting the requirements for BACT may involve a combination of different measures, including coal combustion technologies and emissions control equipment. The BACT analysis evaluates the effectiveness of pollution control technologies, considering energy, environmental, and economic factors. In the case of the HGS, it was determined that the BACT requirement would be met by CFB combustion in combination with state-of-the-art emissions control technologies. State and federal regulatory agencies cannot dictate the types of combustion technologies for power plants if a proposal can meet state and federal standards. Specifically regarding IGCC technology, the discussion of why IGCC was deemed not feasible as a combustion technology for the HGS has been expanded in Section 2.1.5.4 of the FEIS.

4. *The EIS failed to properly analyze cleaner or renewable alternatives working in combination. C17, C51, C59, C61, C80, C85, C106, C108, C113, C116, C121, C123, C124, C125, C135, C166, C209, C210, C212, C213, C214, C215, C216, C217, C218, C219, C220, C221, C222, C223, C224, C225, C226, C227, C228, C229, C230, C231, C232, C233, C234, C235, C236, C237, C238, C239, C240, C241, C242, C243, C244, C245, C246, C247, C252, C253, C278, C282, C285, C286, C295, C300, C310, C319, C330, C334*

The DEIS is also deficient in its alternatives analysis, selecting an extremely narrow range of options for serious study. The DEIS unfairly discriminates against both renewable energy and energy efficiency in a number of different ways. First, the document starts with the false assumption that 250 MW of baseload capacity is needed. Second, the DEIS fails to consider the full range of costs and risks associated with the proposed plant. Third, it stacks the deck against wind by using incorrect and outdated information, and contains no utility-specific analysis of efficiency potential (such as the size and cost of the conservation resource). And fourth, it evaluates each alternative according to its ability to meet the alleged "need" entirely on its own, in isolation of all other resources, thereby setting each of them up for failure. C95, C134

A combination of wind power and cleaner energy technologies could efficiently meet the needs of Great Falls and the rest of Montana without sacrificing our clean air and other

environmental values. However, the DEIS seems to dismiss these alternatives for mostly value or poorly-supported reasons. Upon closer look, the alliance of business people, investors, contractors, utility representatives and city/county/ bureaucrats promoting this power plant raises serious questions of conflict of interest and cast suspicion on the objectivity of statements in the DEIS. Feasible alternatives to the proposed HGS are not fully considered or fairly analyzed. C334

Response: Purpose and need are addressed in PUR-200 in these responses and in Chapter 1 of the FEIS. The FEIS now includes discussion of two combination alternatives. In the first, SME's baseload would be met with a smaller coal-fired facility supplemented by a range of renewable technologies. The second alternative would consist entirely of renewable and/or low-emission non-renewable technologies.

5. *As far as I'm concerned a nuclear alternative should be considered as well given the attempt by the applicant to downplay any viable alternatives except a conventional coal burning and obsolete technology. C25, C64*

Response: The FEIS includes an evaluation of nuclear power in Chapter 2.

6. *As a lifelong Montanan I get fed up with every time we try to move forward with a project, a few people come out and try to stop it. You don't want a nuclear power plant, and clean, efficient hydro would be totally out of the question. Natural gas is not going to work with current energy costs. So unless you have an alternative to the work, please step aside and let the future pass you by. C31*

Response: Thank you for your comment.

7. *Alternative sources of power generation, such as wind, solar, nuclear, and other emerging technologies involve increased cost in construction and generation. These costs are passed along to the members in electrical purchases. C42*

Response: Thank you for your comment.

8. *Montana coal may be inexpensive but new sources of methane (much lower greenhouse-gas emissions) are likely to become available in future - including huge amounts of clathrate (methane-ice) stored offshore on the continental slopes. C64*

Response: While there are a number of promising, futuristic energy sources on the horizon, such as clathrate, these are incapable of meeting SME's need for power in the next few years. Their feasibility may – or may not – improve in the coming years and decades.

9. *Developing our renewable energy sources is a better idea than building a coal-fired plant. Not only will this help mitigate the effects of global warming, but renewable energy also has the opportunity to spread rural economic development. The job*

possibilities throughout the state could be huge instead of adding all the new jobs in the Great Falls area. C104

Response: Thank you for your comment. Renewable energy programs in the state would indeed contribute to rural economic development including job creation.

- 10. The state has said that it will only consider the alternatives that the proponents of the plant propose as being economically viable, that they will not question the proponents determination of economic viability of their proposal and that they have no authority to use the MEPA process to prevent the plant being built. Given that as a backdrop and the fact that the state is applying federal standards, how could the DEQ possibly be doing an adequate job to protecting Montana's pristine environment? The people in the Midwest are a- coughing and a-wheezing from coal plant emissions; why should we allow the same for the citizens of Great Falls? C78*

Response: RUS, not the state, did examine the economic viability of the proposed HGS through its evaluation of the loan application and determined it to be viable. The NEPA/MEPA processes are part of the overall decision-making process on the proposal; in and of themselves, they do not constitute the decision. Neither agency can dictate the initial choice of combustion technology to the project proponent, though they can specify certain pollution control technologies needed to meet permit limits designed to safeguard air quality. DEQ's evaluation of alternatives, pursuant to MEPA is not restricted to alternatives proposed by the project proponent, and the EIS includes evaluation of the alternatives DEQ and RUS found to be reasonable.

- 11. Why doesn't SME – whose co-ops are in farm country – exploit the opportunity to help promote the 'Rural Renaissance' and use the seeds, grains, crop residue and waste products typically produced in farm and ranch country, and start small at local levels to complement wind turbines, to help reduce load needs in their service area? C80*

Response: Simultaneously, RUS is indeed promoting and funding renewable energy in the nation's rural areas, but SME and its member cooperatives are not directly involved in these initiatives. In addition, these technologies have been evaluated and discussed in the alternative evaluation process and found to be inappropriate to satisfy the energy demands of their member cooperative systems.

- 12. At some point there's got to be some realistic evaluation of where we're going to get our energy. As far as that goes, as far as biomass, all these particulars about fuels, all these things they talked about, we should be moving in that direction, for our own sake, and depend less on other countries that really do not want to see us survive. And that's crazy for us to continue that. But it's going to take time, and it will not replace all of the things that we will need electricity for. C96*

Response: Thank you for your comment.

13. *The most exciting thing to me about the proposed plant is that it's not a nuclear plant. And I'm very happy about that. C110*

Response: Thank you for your comment.

14. *The alternatives reviewed in the DEIS appear to be an exhaustive list to which no other reasonable, sensible and workable alternatives can be added. All of us can dream up 'pie in the sky' possibilities, but they must work or they accomplish nothing. When even the use of bottled water was considered and rejected, one knows that the search for alternatives was thoroughgoing and complete. Only someone intent upon delaying and impeding this project would ask for a deeper investigation. Study must end when it serves no further purpose. C130*

Response: Thank you for your comment.

15. *There was mention earlier of the old technology of the CFB. I'm confused because I understand that IGCC has been around for quite some time, longer than CFB. So I don't know, not being an expert on it, but I do believe that that would be misinformation. C148*

Response: Thank you for your comment.

16. *I am a Great Falls native, and I am for acceptable energy. I'm not for traditional or alternative. I'm for adverse-free energy. And that's what we can have, and that's what we must have. It seems like Montana has become the last best place to voice failing antiquated technologies that won't fly elsewhere. And this is yet another shining example. C151, C153*

Response: Thank you for your comment. All energy sources have costs – social, environmental, and economic – associated with them.

17. *What we need to do is use proven technology, and the technology that is proposed in Highwood station is proven technology. It uses some of our natural resources that are abundant in Montana right now. Renewables in Montana have their place, but they will not supply the needs that our state needs. They will only supply a small portion of what we need in the future. Base-load generation is what this state needs. It needs to be owned by Montanans and used by Montanans. C158*

Response: Thank you for your comment.

18. *Overall the draft covers too much unnecessary information. Enough fluff like cultural, retail etc to discourage reading to the scary stuff. The draft should have gone into greater depth to address options like a smaller 100 MW IGCC plant to complement a serious wind farm. Other options could be replacing a dirtier existing coal plant. Building closer to either the source of the coal and or power needs. It seems like Great Falls was picked for its hungrier need for jobs and tax revenue or were they thinking a less informed populace? Is Great Falls headed to be the next Butte to sacrifice the*

environment for the sake of dollars? This plant is not simply a local issue. It will effect the world's environmental health. America is only 6% of the population but creating 30% of the pollution. Our arrogance is creating "blowback". Turning us into truly "Ugly Americans" who are becoming less well liked on the world stage. C127

Response: NEPA, MEPA, and other federal statutes require the agencies to address issues of concern, including cultural resources, which, in the case of the Salem site, are of particular concern due to the presence of the Lewis & Clark Expedition-related Great Falls Portage National Historic Landmark. The FEIS evaluates a smaller coal-fired power plant and includes a more in-depth discussion of the IGCC alternative. Alternative that include a larger wind farm in conjunction with a smaller coal-fired plant or with other renewable energy sources are also evaluated in Chapter 2. The Great Falls area was selected because it best met the site-selection criteria. The EIS does address climate change but addressing per-capita energy usage and greenhouse gas emissions nation by nation is beyond the scope of this EIS.

- 19. Hydrogen is a fuel which burns much cleaner than and produces nothing that could be considered toxic to the environment nor the human body. Hydrogen also produces greater energy output than coal. C205*

Response: Hydrogen (H₂) is more an "energy carrier," like a battery, than a source of energy. Unlike the sun, which consists mostly of hydrogen and helium, there is essentially no free hydrogen on earth. Instead, hydrogen atoms are always combined chemically with other elements, to form compounds, such as with oxygen (O₂) to form water (H₂O) or with carbon to form organic compounds, the simplest of which is methane (CH₄). Electrical energy is required to produce pure hydrogen by separating it from the oxygen atoms in the water molecule through electrolysis. This electrical energy must be supplied by one of the fossil fuels, by nuclear energy, or by renewable sources such as wind and solar.

ALT-301 ALTERNATIVES – EFFICIENCY AND CONSERVATION

- 1. From the vantage point of eastern Great Falls, it seems obvious that great strides can be made here in energy conservation. Such measures should be taken before creating any excess generating capacity. C10*

Electricity can be generated or conserved in countless ways that have less of an irreversible impact than the SME Highwood power plant will have on our state. C50

Even more impressive savings than those associated with wind power could be realized by smart investments in the most cost-effective energy path of all: conservation and efficiency. In its various forms, energy conservation ranges in price from 1 to 2 cents per kilowatt hour. C155

Nothing in the portfolio of this project deals with the global necessity of CONSERVATION. If it was truly the goal of SME to offer a way to save money on power, they would be promoting, teaching, and including conservation in their assessment of future need. If conservation were part of the package here, would 250 megawatts of power be a justifiable need? C105

Yellowstone Valley Electric has had occasional tips in its magazine to show its customers how to conserve energy. It has had programs to encourage off peak power use. I have never seen anything of the kind from Fergus Electric. It has never talked about even the simplest thing such as switching to fluorescent bulbs. Much of Yellowstone Valley's new load is coming from the Billings West End which is people dedicated to conspicuous consumption with nary a thought of conservation in their heads. It may be that the increased costs per kilowatt hour may not rock their finances, but the more they use, the harder it is for the rest of us. The coop partners in SME need to take affirmative action to educate their customers on conservation. It is the cheapest power available. Most coop customers have no idea that their kilowatt-hour rates will nearly double. C106

A much better idea than the HGS would be Conservation and Efficiency in using energy, combined with Solar power and Wind power. Make central Montana and Great Falls not just "the electric city" but the "Renewable Electric City." C122

When I turn my electricity on, 10 below, 40 below, I feel the heat that far away from it, but I get a bill about \$600. So I don't burn electricity during the wintertime. I'll burn wood. I have not seen or read anything about fuel conservation. I've learned that from these electrical co-ops. I have not seen a document that says the last three months we burned less energy. So, therefore, you're going to get a break by \$20 or \$30. C129

Even today, Montana's rural electric cooperatives, as well as the City of Great Falls, are in an excellent position to walk away from this enormous capital investment in an expensive, polluting, centralized fossil fuel generating plant and invest, first, in energy conservation measures, and next in decentralized, smaller scale, diverse renewable energy facilities -- wind, solar, small hydro, geothermal. In the co-ops' case, these could

be sited on their own members' property, earn income for those members, and feed power into the co-ops' own lines. As long as they continue to work with their members to invest in insulation, weatherization, cogeneration and other forms of energy efficiency, Montana co-ops ultimately could produce all the power they need from a variety of decentralized, clean, renewable sources. C155

When are we going to seriously look at the non-polluting energy sources? When the planet has baked to a crisp? Let's talk about conservation of energy! C283

Response: Conservation and efficiency are crucial parts of any overall energy strategy in Montana and elsewhere, and Montana law requires utilities and cooperatives to invest in conservation and efficiency. However, even if additional energy conservation and efficiency measures were implemented, it would still not be enough to meet the purpose and need as defined by NEPA. Nevertheless, the FEIS includes a mitigation measure encouraging SME's member cooperatives to further promote existing and new conservation and efficiency efforts. These would include incentives, weatherization, installation of ground source heat pumps, solar panels, small-scale wind generation, and so forth.

Load forecasts take conservation/efficiency efforts and investments into account. If consumers and the cooperatives were not investing in energy efficiency, these forecasts would show even higher load growth than they do.

2. *Have any direct financial incentives been considered toward load reduction, alter peak and non-peak demand or load-leveling options so that for example, wind farms backing each other up when needed, as suggested by Governor Schweitzer at his Energy summit in Bozeman last October 2005? C80*

Response: To our knowledge, no such incentives have been offered in Montana to date.

3. *I have solar panels on my house and extra insulation on my house. Solar panels are hand built. We all can do that. A bit of conservation will take care of the fear that we have right now about losing our energy. C99*

Response: Individual efforts are important in conserving energy and reducing the overall growth in demand. Montana's cooperatives encourage and support such efforts.

4. *It does not appear that clean technologies such as wind power and more stress on conservation and energy efficiency were adequately addressed. C121*

Response: The DEIS did address each of these alternatives and the FEIS expands the rationale for dismissal of alternatives as well as providing analysis of two combination alternatives addressed in Comment 4-300. The member systems of SME have encouraged energy conservation in the ways articulated in the October

2004 Load Forecast. SME has asserted that it is in the process of updating the October 2004 Load Forecast and that conservation will be addressed in the context of the revised study.

5. *We have over 425 ground source heat pumps in the Yellowstone Valley Cooperative system. That saves base-load generation. When anybody comes and says they're going to build on our system, we recommend to them that they look at ground source heat pumps. That is an energy conserving method that we have utilized. We give a financial incentive to them for that. We have gone to the state and got a financial incentive for developers, so that they can qualify for using ground source heat pumps. C159*

Response: Yellowstone Valley's conservation efforts and expenditures are acknowledged in Table 2-1 in the EIS.

6. *The REA's involved here have done very little to reduce the demand for power. A focused campaign, which is much cheaper than this plant and the future price of coal, could reduce demand by at least 20%. C30*

Response: Table 2-1 of the DEIS presents energy conservation efforts of the SME member cooperatives for 2004. It is expected that these efforts will continue. The member systems of SME have continued to encourage energy conservation in the ways articulated in the October 2004 Load Forecast. SME has asserted that it is in the process of updating the October 2004 Load Forecast and that conservation will be addressed in the context of the revised study.

ALT-302 ALTERNATIVES – SOLAR ENERGY

1. *We have an abundance of sun and wind here and these options for energy production should be considered first C8*

Response: Solar and wind energy were among the alternatives considered in the EIS. While they have many attractive features, they were incapable of meeting the purpose and need as stand alone alternatives. However, 6 MW of wind power has been incorporated into the proposed action.

2. *It is no secret that the United States is about 25 years behind in the use of alternative technology for electric energy generation. For example, this year, 2006, spending a week in Santa Fe, NM, I did not find a single solar collector in this suitable climate. In cloudy Holland solar collectors are used to run harbor and traffic lights on a regular basis. C29*

Response: While the United States has been a leader in some aspects of alternative energy technologies, other countries have also shown leadership in this area. Solar energy – both photovoltaic and other forms – has made advances in this country in the last two decades. However, this form of energy supply will not satisfy the documented need established in the purpose and need sections of the EIS.

3. *Alternate energy especially solar is exceptionally lacking in their current inventory of power, and the 1 net metering service in Beartooth REA's service area is indicative of their lack of any desire for diversity. C30*

Response: The FEIS includes a mitigation measure encouraging all SME member cooperatives to emphasize investments in solar energy as well as conservation measures generally, including installation of solar panels by customers. Again, this form of energy supply will not satisfy the documented need established in the purpose and need sections of the EIS.

4. *Companies such as Nanosolar (backed by Google's two founders, the insurance giant Swiss Re, and others) are beginning to produce inexpensive solar cells. Within five years environmental and health damaging coal power plants, such as the one proposed by SME, may be totally obsolete. C50*

I really want to speak out against such destructive folly anyway. The 'last straw' for me was reading about a new technology for producing photovoltaic cells that reduces the cost of that generating technology by a factor of 4 - which would potentially make it cheaper than coal! C69

The DEIS does accurately present the expensive nature of solar energy, but the technology (particularly with nanotechnology) is improving rapidly, but as demand increases, the cost will continue to drop, particularly when cost of transmission is considered and the benefits of local, 'customized' load demands can be met. C80

Recently-released reports also indicate that the cost of photo-voltaic panels has been reduced by a factor of 4-5, making them highly competitive with grid-supplied electricity for most applications. Several large manufacturing plants are under construction, and within a few years, we may be able to start shutting down coal-fired plants and dismantling much of the electric grid. In that case, our local CFB plant would shut down, too, leaving investors, the co-ops, and the City of Great Falls insolvent. C134

Solar energy must be amongst the cleanest energies available. Recent growth in technology and availability, in Montana, of vast, flat regions of land permit the use of solar energy technology to be exploited at a level never seen before. C205

Response: The cost of solar energy, although it has come down substantially in recent decades, remains much costlier than more conventional energy sources. To determine when it might become more cost-effective is speculative and beyond the scope of this EIS. The EIS includes a mitigation measure encouraging SME to take advantage of exterior solar-powered lighting at the HGS facility, where feasible.

5. *I have a small car and an on-demand water heater along with a solar system for electricity, and I still live in town. Yes, it costs a little bit more, but in the long run it will pay for itself. I had to change my priorities, but I can wake up in the morning and feel good about seeing sunlight and knowing that I'm producing a clean energy. Montana needs the cleanest environment we can get. C147*

Response: Thank you for your comment.

6. *We also are looking at solar and trying to help some of our remote areas with solar wells because of the cost of construction of doing lines out there, as well as we think it makes economic sense to help do that and provide that service. C159*

Response: Thank you for your comment.

ALT-303 ALTERNATIVES – WIND ENERGY

1. *The wind itself is better harnessed as a clean source of energy than this costly, dirty plant. C4, C63, C82, C84, C85, C104*

My choice for energy production is wind generated power. C24, C240

The \$515 million would be better spent on wind power. Renewable energy is our future. C175

The development of wind power such as the recently constructed wind farm at Judith Gap and the smaller wind project on Gore Hill offer much promise. C179

[Judith Gap wind farm] is wonderful, so functional, beautiful and non-polluting. Support wind power for Montana. C246

There are other alternatives to consider. Wind generation is clean and would not pollute the air like a coal fired power plant. C272

What happened to wind power? We certainly have enough wind up here in Northern Montana to put to good use. Especially as the wind is part of the problem in this project since it will blow the pollutants right up to us here on the Hi-Line of Montana. C287

Our state needs to be progressive and look toward news technologies, such as wind power. Great Falls should be “the windy city” and not Chicago! The market is changing and we need technologies that are in harmony with humans and the environment. C291

To drive through the wind turbine “farm” south of Judith Gap is a thrill...to think there is hope for our future and the health of our grandchildren. We are so proud of the people and effort it took to construct that incredible clean alternative. Then, to read of this Highwood Station, is to despair that we as a state have learned anything from a century and a half of exploiting, polluting and spreading toxins in our air, water, and on our land. C297

Great Falls has long held the reputation as one of the windiest cities in the state and, if studied, locations could be found in the area that would be suitable for a large wind-turbine project. Unfortunately, the draft EIS dismisses the potential for a large wind project out of hand. C317

Response: The EIS addresses wind power, but it has limitations in terms of providing both for peak and base load power, due to its intermittency. Wind does not always blow when it is needed. However, the proposed action integrates 6 MW of wind power. Unlike fans, wind turbines do not produce breezes or wind, but convert the kinetic energy of the moving air that constitutes wind into mechanical

and electrical energy. Thus, the proposed wind turbines at the Salem site would not blow pollutants anywhere.

2. *The problem with wind power is that it is intermittent. If you have ever driven by the Judith Gap windmill project when there isn't a high wind, you're going to see maybe three or four turbines running. On the other hand, these turbines are set up to shut off at a certain wind velocity so as not to snap. Wind at its best is 43 percent efficient. It should be part of our electricity, but it's not the solution for dependable, efficient energy. C5, C31, C43*

Response: As noted above and in the EIS, at present, wind's intermittency hinders its more widespread utilization by electric utilities.

3. *A "wind farm" generating facility, provides the great potential benefits of low cost, sustainable and low environmental impacts.... Another major argument given against the development of the wind resource is the periodic calm day which would impair consistent power generation. One response could be to build wind generation facilities in a variety of locales throughout the state.... In short, the wind is always blowing somewhere in Montana and it can be utilized in an intelligent way to ensure a relatively consistent power supply. C10*

I object to wind power being discounted. Perhaps the site would not be able to produce the amount of power the plant would but perhaps it would produce enough for Great Falls. Other communities could do likewise. The alternative of multiple types and places of generation does not seem to have been considered. C45

Response: Siting wind generation facilities in multiple locations requires multiple transmission line interconnections as well as additional costs associated with using the electrical grid. In order to satisfy the demand for electricity and do so completely with wind power would require the installation of at least one additional field of wind generators. This would result in duplication of costs and render this form of generation expensive. Should the wind not blow at both sites, the cooperative would become once again exposed to the market forces of purchased power. Thus, utilities cannot rely on the wind "always blowing somewhere." Two alternatives based on a combination of energy sources are included in Chapter 2 of the FEIS and are mentioned in Comment 300-4.

4. *Wind energy from the Judith Gap project supplies 150MW (Figure 2-5), and facilities on a comparably farsighted scale could supply the bulk of the power to bridge the anticipated deficit in the future. No doubt further technical refinements to the state of the art, such as enhanced batteries or capacitors for storing energy from periods of peak generation, will be developed in time to create a stable market for this power. C10*

Response: These possible advances are too speculative to be relied on to meet the purpose and need at this time.

5. *I happened to be last month in Holland and I saw many, many windmills there. We have, I think, just as much wind as they do in Holland. There are alternatives to a coal-fired plan. C27*

Response: Thank you for your comment. Alternatives are addressed in Chapter 2.

6. *When I asked a city government official about wind I was told that wind generation was way too expensive and it was subsidized by the government. Again, this was a strange argument for it is well known that the US coal industry is also subsidized by the state and federal government through tax breaks. C29*

Response: The principal shortcoming of wind power as provider of baseload electricity is less with its cost – shown by Table 2-2 to be about equal with a pulverized coal plant and less than 20 percent higher than a CFB plant (excluding “firming costs” as shown in Table 2-12 of the DEIS) – than with its intermittency.

7. *This proposal includes a paltry 6 Mega-watts of wind energy. Numerous studies and the accumulation of international experience indicate 20% of electrical power from wind is easily attainable. The REA’s and SME’s administrators continuously seem exasperated at the possibility of using an intermittent source. C30*

Of course, you cannot have base load consisting only of wind. But in Europe, particularly in Germany, the base loads are working very well with the combination of winds up to 20 percent. C110

Response: The intermittency of wind has a “firming cost” associated with it that raises its overall cost to the utility and the consumer. In essence, the utility has to pay a price to ensure a continuous supply of on-demand power, which raises the cost of wind power to about 50 percent higher than that from a CFB plant (see Tables 2-6 and 2-13 of the FEIS). There are also recent reports that the utility systems in the European Union are experiencing system instability and dispatch issues due to the high utilization (in excess of 20 percent) of wind power which was once embraced as the solution for generating stations.

8. *My husband and I have wondered more than once why there aren't more wind-generating plants in Montana. Now we have one answer: Montana doesn't plan for them. Why not? Surely there is plenty of wind! In the Highwood Generating Station, you could certainly use wind. I am told that you are using 20-year-old technology there, however. But wind power must be as old as that. If age or proven effectiveness is a factor, why not use it? C32*

Wind cannot realistically supply 250MW, but it could [in] amounts that could be scaled up, depending on financing opportunities, land use agreements, wind site potential, so why wasn't Wind Energy encouraged more, but not on such a 'tiny' scale with four turbines? C80

Response: In Montana as elsewhere, wind power is rapidly increasing as a source of electricity. It is the fastest growing source of electricity in the United States today. The HGS would include 6 MW of wind power.

9. *Bat mortality has been substantially improved with a new rotor design. C58*

Response: Thank you for this information.

10. *How were cost projections in Table 2-2 determined, as I question how capital costs and fixed O & M? The Judith Gap Wind Farm (highly praised in the DEIS), cost 150 million dollars, for 135MW capacity with 90 turbines covering only 14 square miles. Governor Schweitzer 'lauded' the facility, and he himself stated the MWhour cost at \$38, to include firming costs. C80*

How did SME establish \$50.60 MWH, whereas the real numbers (actually endorsed by Governor Schweitzer) from a world-class and proven wind resource like Judith Gap is actually \$31.60, and adding \$7.50 for firming costs brings the cost to \$39.10, much less than what Table 2-2 misrepresents, and doesn't account at all for carbon tax and sequestration costs? C80

One thing that concerned me about the DEIS was the poor score that wind power was given. I worked for five years trying to get the Judith Gap wind project off the ground, and I am very familiar with a lot of the economics of that and know for a fact that it's the cheapest power that can be produced starting from new construction these days. Even when you add the cost of firming, the power in Judith Gap was cheaper than this plant. C110

Already customers of Fergus Electric Cooperative, one of the five southern Montana rural electric cooperatives banding together to build this plant (with Great Falls as partner), typically pay the highest electricity rates in the state. They -- and customers of the other partners in this dubious enterprise -- can expect to be paying much more if this plant is constructed. New coal power is coming online in the range of 6 to 7 cents per kilowatt hour (or even higher). By contrast, the clean renewable power from the windfarm at Judith Gap is flowing to customers of Northwestern Energy for about 3.7 cents per kilowatt hour. The Highwood Plant is expected to cost \$515 million to build. An equivalent amount of windpower would cost about \$300 million. C155

Please re-analyze and address the issue of wind power. Your Draft EIS figures showing a \$50.60 per megawatt-hour are not at all well supported and other estimates put this cost high, probably more than \$10 a megawatt-hour high. It is evident that the \$50.60 figure is out of line and includes vague and unsupportable ancillary costs. C294

Response: Figures shown in Table 2-2 were a compilation of levelized costs of new utility generating plants in the Northwest Power Pool Region. The cost of wind power has tended to come down in the last couple of decades, and the \$38/MWhr cost for the more recently constructed Judith Gap Wind Farm would be indicative

of this trend. Table 2-12 shows a cost for wind of \$35/MWhr, but this excludes the firming cost for “spinning reserve” needed to supply on-demand power when the wind is not blowing.

There have been “hints” of lower costs from the Judith Gap project, but there has not been anything official published by NWE or the facility operator on the actual cost of generation including firming. Without knowing the source and cost of firming in the quotes given in public comments, it is impossible to verify them. The costs presented in the DEIS stated the assumptions and sources of costs used in calculating the blended rate (wind + firming from market priced electricity). At present, there is no carbon tax, and the imposition of a carbon tax on fossil fuels in the near to medium-term future in the United States is not certain. Likewise, whether sequestration of CO₂ would ever be required or is technically and financially feasible, is highly speculative.

11. *Doesn't SME and ECP realize that Montana has the potential to provide 116,000 MW of wind power, and why doesn't that motivate them to exploit that tremendous potential, even in SME's our customer area where transmission lines are accessible? C80*

Response: As noted in other responses, wind's intermittency remains a hurdle to realizing this potential. Access to existing transmission lines and the need for more transmission capacity are a major short-term impediment to wind power expansion in the state.

12. *How did SME determine its 250MW 'wind farm' footprint' – which is far too high – when compared to the Judith Gap Wind Farm, which has 90 turbines providing 135MW and covers 14,000 acres or nine square miles and is operational? C80*

How does the one hundred acres needed for four 1.5MW wind turbines 'square up' with the earlier estimate of 46,000 acres for 166 potential wind turbines (a rough estimate reveals that at 100 acres per four turbines, the result would be 4-5,000 acres or somewhat higher for spacing and efficiency, but nowhere near 46,000 acres)? C80

Response: As a result of a typo in the estimated wind power density, in the DEIS an average power output of 3.47 MW/square mile was used, instead of 13.47 MW/square mile. Thus, the estimated area to provide 250 MW of capacity in a class 4 area is 18.6 square miles rather than 72 square miles. This correction has been made in the FEIS.

13. *Any serious wind energy advocate knows that a 250MW 'wind farm' would not be practical as it cannot meet peak and load demands, so why did SME even speculate on a 250MW size wind farm, vs. a more practical approach like the proven 135MW Judith Gap wind farm the DEIS mentions extensively? C80*

Response: In the FEIS two alternatives have been added that combine renewable technologies and fossil fuels such as coal and natural gas.

14. *Why doesn't the DEIS even mention the direct economic contribution to landowners, such as wind turbine lease payments that range from \$2 – 4,000 dollars per turbine? According to www.nationalwind.org, rural land owners, particularly farmers and ranchers hit hard by our lingering drought, could reap the greatest benefits from wind energy development, AND also local county governments through property taxes. C80*

Response: Private landowners such as ranchers and farmers who lease property to wind developers are often beneficiaries of wind power development, and have become some of its biggest advocates. A statement to this effect has been added to Section 2.1.3.1 of the EIS.

15. *How will SME incorporate wind energy if the industrial park site would be the option decided upon? C80*

Response: If the Industrial Park site were to be selected, the wind component would not be included due to insufficient land area.

16. *How will SME obtain financing for the four wind turbines at the Salem HGS site? C80*

Response: SME would obtain financing from a separate source for the wind turbines. They would not be funded by the loan from RUS. SME's application under the CREBs program for its wind turbines was approved by the IRS on December 1, 2006.

17. *If SME were to consider a wind farm option instead of a coal plant, how many construction and permanent jobs might that create and also projected property taxes and financial benefits for landowners? C80*

We should focus on wind power here. Backed up with existing dirty power that is already online. There has been much salivating over jobs and tax revenue. Wind would also create some of both. Farmers would be rewarded. Power contracts in the future will require more "green" power like Malmstrom's 8% in the near future. C127

Response: If wind power was considered a viable alternative, this detailed level of analysis would have been conducted. Job creation and property tax benefits would have been quantified. As noted, developing wind power would indeed generate jobs and property taxes for the local economy.

18. *Beyond price comparisons with coal, windpower offers deeper and longer-term cost savings: no use of water, no pollution, and the "fuel" is free. Windpower also can come online much faster than coal, and in smaller increments, making it less of a burden to finance, since the money need not be raised all at once, as with a single large facility. C155*

Response: Thank you for your comment. Wind power does indeed enjoy these benefits but, by itself, fails to satisfy the purpose and need.

19. *Presently four 1.5 MW wind turbines are proposed along with the 250 MW base load coal-fired power plant. We commend SME for proposing supplemental use of a renewable resource such as wind energy to help meet power needs and reduce burning of coal. We ask if it would be possible to increase the wind energy production component of this project to further reduce coal burning when wind energy resources are available? Could some of this maximum base load capacity be met with wind turbines, especially if load leveling energy storage systems are considered? Would it be feasible to consider a proposal whereby approximately 15 to 20 percent of the power needs of SME customers could be provided by wind energy? For example, have a 200 MW coal-fired power plant and 50 MW of wind turbines. This could be considered as a method for reduction in pollutant emissions to lessen visibility impairment. C36*

Response: The FEIS has included two combination alternatives which include renewable components like wind. The performance evaluation of the wind turbines at the HGS could lead to further development of wind power by SME.

20. *SME's proposal is woefully inadequate and out of date in its investigation of alternative energy sources. The initial feasibility study capped wind power at 3% of an energy portfolio (Montana law mandates 15% renewable energy by 2015); the Judith Gap Wind Farm already provides 8% of Northwestern Energy needs. Will the Great Falls coal plant use up so much of our current transmission capacity that it will discourage the development of new wind farms or the generation of electricity by ranchers who could produce wind or hydropower as new "crops"? Conversely, because new wind farms can be brought on line much faster than coal plants, will transmission of electricity from the wind generators being put up by the counties, the proposed 500 MW wind farm north of Glasgow by Wind Hunter, and by Northwestern Energy/Babcock and Brown leave any transmission capacity for SME? C20*

Response: HGS use of the electrical grid would not be affected by new wind development in the state because its portion of the grid and its allocation of the Great Falls substation is already reserved. Use of the substation and grid by electricity generators is on a first come, first serve basis. New generation facilities would necessitate additional capacity on the grid. Additional transmission lines are being proposed and built, some specifically to handle wind generation.

ALT-304 ALTERNATIVES – HYDROELECTRIC ENERGY

1. *Our hydroelectric dams are all owned by an out-of-state electric conglomerate. We have no control over that. C5*

It is ironic that Great Falls, founded with the prospect of bountiful electrical energy from its beautiful waterfalls, should now have to endure a massive coal fired power plant. C13

There is more energy produced here in Great Falls by PPL hydro than we need. C78

Instead of chasing the 'coal train', why doesn't the City of Great Falls expend its energy to REGAIN its heritage, the dams on the Missouri River that Paris, the first mayor, had the vision to develop as clean, renewable energy which became the city's namesake, the 'Electric City?' C80

Wouldn't it be smart to explore updating the turbines in our dams? C87

The EIS states that there are 5 hydro-power facilities near Great Falls. SME should look at purchasing these plants in lieu of spending vast quantities of money to build a new coal fired plant. Hydro power will work very well with wind power and other forms of add on power. C104

We have labor, we have power, and we have people here. We're all Montanans. I understand you need the power. We don't want to take the power away from the people that need it. We need it in Great Falls. We have the five nicest dams in the world, but we don't own it. PPL does. C153

Hydroelectric technology, though expensive to construct is less damaging to the planet and has acceptable repercussions to humanity, although the effects to our ecosystem are questionable. C205

Response: Thank you for your comments. The five hydroelectric dams on the Missouri River at Great Falls do generate renewable, clean energy. As indicated by several of the commenters, these facilities are owned by a private utility that has other commitments for the power that the dams produce. Therefore, this energy is unavailable now and in the foreseeable future to SME and ECP.

SME has issued several requests for proposals for power to area power generators with hydroelectric generation in their systems; the responses from the generators show costs that reflect market prices of electricity. It is unrealistic to assume that the private owner of the hydroelectric dams in the Great Falls area would be willing to sell that power to SME at the cost of generation.

ALT-305 ALTERNATIVES – INTEGRATED GASIFICATION COMBINED CYCLE (IGCC)

Overall DEQ Response to all IGCC-related Comments under ALT-305

SME-HGS proposed a coal-fired power plant incorporating circulating fluidized bed (CFB) boiler technology for the production of steam to be routed to a steam turbine, which in turn drives an electric generator capable of producing electrical power. The United States Environmental Protection Agency's (EPA) Draft New Source Review Workshop Manual (October 1990) (NSR Manual), which provides guidance on the best available control technology (BACT) analysis and determination process for major sources of air pollution, states that, "historically, EPA has not considered the BACT requirement a means to re-define the design of the source when considering available control technologies." However, the NSR Manual goes on to indicate "...this is an aspect of the New Source Review – Prevention of Significant Deterioration permitting process in which states have the discretion to engage in a broader analysis if they so desire."

Further, a recent EPA policy/guidance statement titled *Best Available Control Technology Requirements for Coal-Fired Power Plants*, authored by Stephen D. Page, Director, EPA Office of Air Quality, Planning, and Standards (December 13, 2005), provides that inclusion of technologies such as integrated gasification combined cycle (IGCC) in the BACT analysis for a coal-fired power plant, such as that proposed in this case, constitutes re-definition of the source and is not appropriate under the BACT analysis and determination process. EPA has recently indicated that the policy described in this memo does not constitute the EPA's final decision on this issue but does constitute the EPA's legal opinion on the issue at this time.

Based on the DEQ analysis of the proposed project, the DEQ determined that redefining the source from a CFB project to an IGCC project is not appropriate, in this case. For a more detailed analysis of IGCC, including an analysis of technical, environmental, and economic impacts, associated with the use of IGCC for the SME-HGS project, see Section III, BACT Determination, of the permit analysis to the Supplemental Preliminary Determination on the Montana Air Quality Permit (MAQP) #3423-00 included as Attachment I of the DEIS, DEQ Supplementary Preliminary Determination on Air Quality Permit #3423-00.

Comments and Responses

1. *Far cleaner and viable coal plant technology, such as integrated gasification IGCC, now exists. Choosing IGCC over CFB can change the future of Great Falls for the better. C4, C8, C88, C263, C269*

Based on a July 2006 EPA report, IGCC technology is anywhere from 1.7 to 10 times cleaner than CFB technology. Water use is also significantly lower with an IGCC (about 10% less than that estimated for the HGS). C23, C73

Montana has a lot of coal deposits, and we as citizens have a right to say use it safely or don't use it at all. Sooner or later we will all need these deposits, but we'll manage them correctly and safely for everyone. An IGCC integrated gasification combined system plant sounds like the solution to help everyone. It will produce electricity and help clean up the environment. Yes, it may cost 15 to 20 percent more. C147

I would not be opposed to an IGCC plant going in if it was able to capture most of the mercury and carbon dioxide emissions. C259

Response: The EIS acknowledges the various potential environmental advantages of IGCC technology, but also points out its limitations at this point in time as a viable alternative to the CFB technology proposed for the HGS.

2. *The DEIS does not provide an adequate examination of IGCC technology in regards to the requirement to implement the BACT. C8, C110*

The air quality issues raised by the HGS would be resolved to an acceptable level with the use of the IGCC process, which has been given little regard in the proposal and the draft EIS. I encourage a thorough and unbiased study by both SME and DEQ of this process and the use of combined systems such as natural gas-fired turbines, wind and solar power plants to reduce the level of environmental pollutants. C12, C78

The RUS would be remiss in accepting the incorrect data cited in the DEIS regarding the comparative reliability and emissions standards of an IGCC coal plant facility (Table 2-7). Harry Jeagher, the editor of Gas Turbine World, cites a January-February 2006 reference that documents 90% reliability. Having personally interviewed John Thompson of the Clean Air Task Force and James Childress, Executive Director, Gasification Technologies Council, I am convinced that Bison Engineering and Stanley Engineering have not kept abreast of current developments in clean coal technology. At our invitation, Mr. Thompson presented educational forums on IGCC in Great Falls and at the Governor's Office in Helena, and Mr. Childress wrote an opinion column for the local newspaper. On this basis alone, I think the RUS would have justification in determining SME's application to be out-of-date and incomplete. C20, C84

The IGCC alternative to CFB merits detailed evaluation in the EIS. The EIS incorrectly states that IGCC is not cost effective, needs more research to attain higher availability, and does not enjoy significant emission advantages over CFB....each of these conclusions is incorrect. Therefore, the EIS should not have eliminated IGCC from detailed review. We respectfully request that the EIS be revised, adding IGCC to the options evaluated in the detailed analysis. C23, C77, C105

This document dismisses IGCC technology prematurely and without adequate justification for its dismissal. C25

We recognize that the proposed CFB technology and technology proposed for reduction of air pollutant emissions provides good control of air pollutant emissions, and the overall contributions of HGS air emissions to global climate change are relatively small on a national scale. However, IGCC is a dynamic and rapidly evolving technology, and has the potential to make carbon capture and sequestration much easier and cheaper than the proposed CFB plant. It is not clear to us if the latest information on the rapidly evolving IGCC technology has been fully evaluated in the DEIS and considered by SME

and the RUS, especially considering that this proposed HGS plant would not become operational until 2011, and would be in use for decades after that. C36

Response: Please refer to the overall DEQ response to ALT-305 at the top of this section. Since IGCC was not carried forward as a final alternative, it was not subject to detailed analysis. However, additional information regarding IGCC technology has been added to the FEIS that supports its dismissal as one of the final alternatives. With the inclusion of this information, we believe that the EIS's evaluation of IGCC reflects the most current knowledge concerning this emerging technology.

3. *An IGCC plant would require less coal to produce the same amount of energy, use much less water, produce commodities that could be used in agriculture, transportation, and provide a ready source of wintertime heating for other facilities within the Industrial Park. Unlike the CFB coal plant, an IGCC facility has the potential to sequester greenhouse gases such as CO₂ (and even makes the CO₂ available for sale for enhanced oil recovery), produces less acid rain, makes purified sulfur available for agriculture, can generate hydrogen for fuel cells, can be used to make natural gas when the need for electricity is low, can make diesel fuel (syngas) and can be throttled back or ramped up to firm up the wind power that will become increasingly prevalent in our windy area. C20, C64*

It is our understanding that IGCC technology in addition to offering potential reductions in air pollutant emissions and (when used with a shift reactor) emissions in greenhouse gases, also has potential advantages of requiring less water; producing less ash requiring disposal; and avoiding the need for the addition of limestone and ammonia during the combustion process for sulfur and nitrogen oxides emissions control. It is not clear to us if these benefits of IGCC have been considered during the cost-benefit analysis for IGCC vs. CFB technology or in the analysis of alternative power plant sites. C36

How does SME rationalize its belief that IGCC is 'experimental,' despite the fact that the Environmental Protection Agency strongly affirms that IGCC uses 40% less water and has higher coal burning efficiency and is cost competitive? C80

If coal is being crammed down our necks than why not IGCC? Countries like Ireland and Italy and Australia have this. It is a system that doesn't release 73 toxic chemicals in the air. It uses 40% less water, and there is less CO₂ emissions. C165

Response: The EIS acknowledges that IGCC technology has the potential to yield both environmental benefits as well as economically valuable byproducts. It should be noted that many of these are potential benefits. However, these actual and potential benefits are not enough to outweigh this technology's current limitations for baseload power generation.

4. *THE RUS SHOULD NOT PROVIDE LOAN GUARANTEES FOR ANY NEW COAL PLANT UNLESS IT EMPLOYS THE ZERO EMISSION INTEGRATED GASIFICATION COMBINED CYCLE (IGCC) TECHNOLOGY OF THE 21st CENTURY. An IGCC coal plant removes mercury in such a pure form that nearly all the mercury from one year's supply of coal would easily fit in a closet, instead of being scattered in our air, deposited on our land and incorporated into the fish of our scenic waterways. Industry may complain that IGCC is too expensive (they can't afford not to do it); that it can't be financed (IGCC plants are currently being planned by Exergy, Basin Electric, and numerous others); that IGCC is "unreliable."* C20

Since IGCC would not contribute as much to pollution as CFB I feel that it is time we put public health first. Even though IGCC would cost more up front, in the long run, it would be more profitable. C132

As a consumer of Tongue River Electric and Mid-Yellowstone Electric, I would hope that a thorough comparison of the costs that would be required to retrofit the planned Highwood plant to capture carbon dioxide and any other pollutants which foreseeably could be required to be removed and the cost of a plant utilizing IGCC technology be made. I don't think it's unrealistic to anticipate a time when our government would either implement a carbon tax or require the removal of carbon dioxide from coal fired plant emissions. C318

Response: Please refer to the overall DEQ response to ALT-305 at the top of this section. While IGCC is not "zero emission," the EIS recognizes that this technology in general has lower air emissions than CFB. However, due to its lower reliability, the emissions of power sources supplying power when the IGCC plant is down must be accounted for, as well as the increased capital and operating costs. Numerous factors including reliability, cost, and emissions were considered in the evaluation of IGCC. As alluded to in the overall DEQ response above, as long as the proposed emissions meet the NAAQS and MAAQS and their permit conditions, the specific technology selected is at the discretion of the project proponent (SME).

5. *The EIS also mischaracterizes the commercial status of IGCC. On page 2-31, the EIS attributes the following claims to the USDOE: 1) IGCC has insufficient operating experience; 2) That major components of IGCC have not been integrated into power applications, and 3) that the technology has been demonstrated at only a handful of facilities worldwide. Attachment 1 is the DOE reference cited by the report. These conclusions attributed to DOE by the EIS are not found in the article and should not form the basis for rejecting IGCC from detailed review.* C23

Response: The FEIS has been modified to more accurately reflect the USDOE attachment cited in the DEIS. The subject DOE attachment was cited regarding the number (two) of IGCC plants currently operating in the United States.

6. *By failing to look at total costs, and by focusing exclusively on today's costs and not future costs, the EIS reaches the wrong conclusion that IGCC is not cost effective.* C23, C24

Twenty-four plants using IGCC have been proposed....The cost of the plants is one billion dollars for 600 megawatts for one plant. We're spending 515 million for 250 megawatts. There's another plant that is 630 megawatts, and that is projected to cost one billion dollars also. C68

When carbon capture and sequestration is included in the economic analysis, IGCC creates electricity 18-32 percent cheaper than pulverized coal plants, according to a recent report by the Western Resource Advocates. C73

In regards to Table 2-6, how does SME arrive at the questionable '42.8' figure for an Integrated Gasification Combined Cycle (IGCC) plant, when which compared to Circulating Fluidized Bed (CFB) technology, is 42% higher than typical estimates of 20-30 percent, NOT 42%? C80

Response: SME and its consultants investigated current and potential future costs in its analysis of various technologies to provide electricity to its customers.

7. *The EIS also incorrectly concludes that IGCC plants do not achieve acceptable levels of reliability. This conclusion is not supported by the facts. Three of the newer IGCC plants are found at Italian refineries.... the capacity factors of these three plants are between 90% and 94%. Only one of these plants operates with a spare gasifier. All three IGCC plants utilize liquid refinery wastes not coal. But to use coal in most gasifiers, the coal must be slurried to a liquid, so the gasifier, and all the key downstream equipment, is exactly the SAME as the ones found in the Italian refineries. As noted in the Turbine World article, US power companies overly focus on Wabash and Polk plants. These older plants have availabilities that don't exceed 85%. C23, C24*

IGCC isn't as experimental as the draft claims. There are hundreds already operating with more being built to use western coal. C127

IGCC technology has been around since 1970, but it is funded by the Department of Energy to research its viability. It's been found that it's very viable and economically feasible. They have funded several plants around the United States. They're producing power economically and were partially funded by the Department of Energy. So there are plants running right now using IGCC technology. So it can be done and should be done, if we're going to use coal here in Great Falls. C135

According to SME, in an article in the Great Falls Tribune dated 8-28-2006, the IGCC method was ruled out in the draft document because it would not be "cost-effective" and lacks an "acceptable level of reliability." Why would Indiana, Florida, and possibly Colorado build the IGCC plant if it wasn't reliable? C299

Response: The FEIS includes additional information on the reliability of IGCC. RUS and DEQ acknowledge that varying professional and scholarly opinion exists concerning the reliability issue. RUS, in evaluating the loan application and the SME proposal, has considered this uncertainty and SME's analysis that the risk of

investing in IGCC is too great at this time. Also, please refer to the overall DEQ response to ALT-305 at the top of this section.

8. *We note also that the CEQ regulations for implementing NEPA indicate that unquantified environmental impacts and values should be considered (40 CFR 1502.23). We believe the FEIS should better explain how such unquantified environmental impacts and values (i.e., reduced emissions of air pollutants; reduced emissions of greenhouse gases; reduced ash disposal; reduced use of limestone and ammonia; and reduced water use and wastewater discharge) have been considered in the cost-benefit analyses for IGCC technology. C36*

Have the incentives in Title XVII of the Energy Policy Act of 2005 (42 U.S.C. 16511-16514) to facilitate deployment of innovative technology such as IGCC technology been considered in the cost-benefit analysis? C36

Response: These unquantifiable factors were considered in both the Alternative Evaluation Study and EIS. (This is not required under the RUS NEPA regulations.) The incentives of the Energy Policy Act of 2005 do not change the conclusion that the risk of investing in IGCC technology is too great at this time. SME has considered the incentives of the Energy Policy Act of 2005 and made application to participate in the Clean Renewable Energy Bond (CREB) program enabled by the Energy Policy Act of 2005. SME submitted an application to the Internal Revenue Service (IRS) as prescribed by the Energy Policy Act of 2005 for \$12 million to construct 6 MW of wind generation at the HGS location. On 1 December 2006 it was announced that SME's CREBs application was approved.

9. *The co-ops and the city don't have the luxury of waiting for unproven technology of IGCC to come on line to provide the power that we need right now. It's a simple fact that they need to be lining that power up. IGCC may well be the power source of the future, but it's not commercially fundable right now. C52, C139*

The fact is, as technology incrementally improves, decades go on. And there will be new technologies coming down the line. There will be sources of power that will be able to reinsert CO₂ into the ground, so we can take care of some of this global warming problem...An MEIC speaker at a conference some months ago suggested that really what Great Falls should be doing is adopting IGCC, so that we in Great Falls here and these co-ops, people who use power in this room can prove to China and India that IGCC is a worth-wild technology and is available now. That may well be the job for someone else. But I don't see it as the jobs of these five co-ops and this city to solve the problems in the world right now. C52

We understand that CFB technology is not perfect. We also understand that in many people's mind it may not be considered as cutting edge technology. But cutting edge technology and the development of cutting edge technology is something that is best left in the hands of those who can afford the risks associated with that particular process. The five electric co-ops that comprise Southern Montana G&T are not those entities.

These are hard working, salt of the earth people, serving two Indian reservations, and other agricultural based communities across the State of Montana. And that's simply a risk that they cannot afford to take. We believe in the IGCC technology. We looked at it closely. It just did not meet our needs. C128

IGCC technology is in the developmental stages. The technology promises to be viable for future base-load generating facilities. However, further development is needed to prove the technology can result in lower costs and achieve the reliability and availability to meet the industry standards for base-load power. C131

Other clean-coal technologies such as IGCC generation hold promise for the future but to our knowledge is not yet commercially viable. With the clock ticking on the expiration of power supply contracts to serve their customer-owners, the electric distribution cooperatives involved in the Highwood project do not have the luxury of waiting for these technologies to become viable. C178

IGCC is not feasible at the present time. The reliability of these plants is only 80% or less. The generation that is built to serve SME has to be more reliable to be able to be seriously considered. Our cooperative members have to have a very reliable power source. Another problem with IGCC is that the initial cost is approximately 20% higher. If the CO₂ is to be captured it adds more cost to the annual operating expenses – maybe as much as 30%. C44

If CO₂ is captured where does SME put it? To seriously consider the capture of CO₂, our Federal government needs to do some extensive studying to discover if it stays in the ground when it is pumped underground, or simply to determine the most cost effective way to capture and keep CO₂ from getting into the atmosphere. The way I see it, the CO₂ mitigation problem is in its infancy and whether or not IGCC is a part of the answer is open for debate. C44

Response: Thank you for your comments.

10. In the coming years in the U.S., perhaps one-quarter of the plants, new coal-fired plants will be IGCC. The new generation gasification plants are here now. For now gasification plants are being planned mostly in states that are trying to limit carbon dioxide emissions, and some states, including Washington, Oregon, California and Vermont, are factoring in the environmental aspects of proposed new plants when deciding what to authorize. Colorado and Wyoming, big coal producing states, are pushing gasification projects. So it is here. It's now. It's today. C68

Why can't SME be flexible enough to realize that other states are becoming LEADERS in IGCC, particularly Colorado, where XCEL Energy is starting work on a 500 million dollar IGCC plant that will provide 300MW or more of energy, and has SME looked at what Basin Electric in North Dakota is doing to build an IGCC plant there? C80

Response: Thank you for your comments.

11. *Unless Montana's coal industry and utilities adopt new IGCC (Integrated Gasification Combined Cycle) technology soon, Montana may lose up to \$59.2 million a year in public revenue to eastern coal, and our coal industry may lose \$249.6 million a year by 2035. That is the conclusion of a recent Western Resource Advocates (WRA) report. C73*

IGCC plants, which engender the cleanest coal technology available, have demonstrated the economic and physical capability of using eastern bituminous coal, which has a higher BTU content than western coal. IGCC gives the lower moisture content, eastern coal a present competitive edge. So it will be substituted for western coal now being used in eastern markets as older coal plants are replaced with IGCC plants nationwide. C73

Sulfur, mercury and other pollutants involved in fossil fuel generation can be cleaned easily from high sulfur coal with IGCC technology, reducing the need for low sulfur coal and giving the higher BTU content eastern coal a competitive advantage. C73

Response: Thank you for your comments, which relate to an issue beyond the scope of this EIS.

12. *When will ECP consult its prospective investors on what the financial community considers the 'best' coal-burning technology, which according to Standard & Poors, IGCC receives high marks? C80*

Response: The City of Great Falls (in conjunction with its bonding team) is in the process of selecting an independent consulting engineer to review its decision to participate in HGS in accordance with standard bonding practices.

13. *Why didn't SME approach the Department of Energy and take advantage of the Clean Coal Power Initiative initiated by President Bush in 2002, supported by 10 billion dollars over a ten year period? C80*

Response: The DOE program was intended to partially fund generation projects designed to serve as research facilities where emerging technologies can be perfected. The program is intended to aid in the construction of these facilities by large utilities in a position to assume the risks associated with the use of a developing generation technology still in the neophyte stages of development. There are reliability and financing issues associated with IGCC, as stated in other responses to comments.

14. *By comparison, what temporary and permanent jobs would an IGCC coal-fired plant offered, and what about jobs generated from the IGCC process associated with by-products? C80*

Response: If IGCC had been considered a viable alternative, this detailed level of analysis would have been conducted. Job creation and property tax benefits would

have been quantified. Developing IGCC would indeed generate jobs and property taxes for the local economy.

15. *Page ES-4, first paragraph. Add to statement on IGCC plants that when an IGCC plant is down for repairs and unavailable to generate electricity, it is necessary to purchase other energy, which may come from older coal-fired generating facilities with higher emissions than HGS. Further, such energy purchases will be made at a premium, thus driving up the operating costs of an IGCC plant versus a CFB plant. C128*

Response: A statement has been added to the FEIS indicating that having to purchase power on the market while an IGCC plant is under repair would necessarily involve higher economic costs; such power purchases could potentially come from older coal-fired facilities with higher emissions or from cleaner facilities with lower emissions.

16. *Currently there are four IGCC projects installed and in operation in the U.S. and Europe. The two projects installed in the United States are the Polk Power Station Unit Number 1, owned and operated by Tampa Electric Company, and Wabash River Energy Limited, a unit owned and operated by Wabash River Coal Gasification Repowering Project, a joint venture of Dynegy and PSI Energy, Inc. Both units utilize a fully integrated design of the gasification combined cycle process. Both units receive funding from the Department of Energy, DOE, for 50 percent of the total project costs. Both units burn bituminous coal on a continuous basis. Short-term tests were performed utilizing other fuels including a sub-bituminous coal. C131, C139*

As currently configured, neither of the two IGCC units now operating in the United States utilizes mercury and/or carbon dioxide, or CO₂, specific emissions control equipment. Both units have availability factors less than 80 percent over the many years of operation. Since both of the units have completed their demonstration phases, they both have final reports which can be obtained from the Department of Energy website. C131

The alternative evaluation study documents the commercial availability of the IGCC process as: The current and near-term IGCC plants must be viewed as technically feasible, but not cost effective with low reliability, which renders the technology to be not economically attractive. The current IGCC plants are providing operational information about the technology, but fail to demonstrate the necessary cost of electricity to allow the technology to be available commercially in time to support SME's needs. This statement is supported by Luke F. O'Keefe of Burns and Roe in their 16th Annual Burns and Roe Seminar Gasification and IGCC Technology on March 21st of 2006. Mr. O'Keefe's summary slide states, "IGCC still needs to confirm cost, schedule and performance." C131

General Electric's view of the current technology goals also supports the view that IGCC still needs to confirm cost, schedule and performance. GE is regarded as one of the leading suppliers of equipment for power generation stations and is a current

gasification technology provider as they acquire the Texaco gasification process in 2004. In a presentation to the Gasification Technologies Council on October the 10th, 2005, GE stated the current reference plant design is projected for completion at the end of 2006. This reference plant design is being developed in order to reduce cost, improve reliability, availability and maintainability. Other suppliers of gasification technology have made similar statements related to goals for improvement of the IGCC technology. Several years of operation will be needed after construction is completed to prove the reference plant design and verify the cost projections. This verification is projected to be complete many years after the needs of Southern Montana Electric begin to manifest themselves in July of 2008. And we have not seen any significant developments in the use of IGCC that would alter our initial views of the appropriateness of using IGCC technology as articulated in the alternative evaluation study. C131

Response: Thank you for your comments. Appropriate information has been added to the FEIS.

- 17. If the SME co-ops really think they need to build some sort of coal plant somewhere in their service area, their best option, in our view, is to build a coal gasification and combined cycle gas turbine generator at one of the mineheads like Decker or Nelson Creek. This would supply their members with Diesel and natural gas, as well as provide peak and alternative power for distributed wind generators which could be co-operatively owned and built as income producers on member's farms and ranches. This would be true energy independence for the immediate and mid-term period (say, three decades, the projected lifespan of the Highwood Station). And it wouldn't require the water rights provided by the City of Great Falls, which is the only tangible reason why SME might have wanted to build a CFB plant, here. IGCC can use as little as 10-20% as much water per day (or per megawatt of power generation) as a CFB plant, and a lack of water is most of the reason why the Decker and Nelson Creek sites were rejected. C134*

We would suggest to SME, its members and rural customers, that they pursue, instead, a coal gasification plant at one of the mine sites mentioned in the DEIS. Such a plant could produce diesel fuel, gasoline, natural gas substitutes, as well as electricity without the vast water requirements of a CFB plant. It would also have the capability to provide "peaking power" according to a daily schedule to firm up wind resources, and provide a substitute when output from wind generators is not available. When there is adequate or surplus wind blowing, an IGCC plant could quickly switch to diesel or hydrogen production for local use, or to be marketed as additional income for the co-op. Hydrogen can also be generated by surplus wind power and burned directly as fuel or used in fuel cells. This is the energy future which most experts envision. The quicker we begin making the transition to a hydrogen economy, the better it will be for all of us. C134

Response: Water, while one of the primary considerations in the rejection of other sites like Decker and Nelson Creek, was not the only factor in site selection. The production of byproducts such as those cited is acknowledged as a potential benefit of IGCC. Hydrogen production from IGCC, wind power, or other power sources,

for subsequent use as a fuel is an area currently undergoing research, but its applications lie in the future. A gasification project has to be configured for specific products. It would not be feasible to switch back and forth between electricity generation and the production of hydrogen. If the facility were to be configured for both electricity and hydrogen, then more coal would have to be used to obtain both products or less of one product would be generated or produced. This would then lead to higher emissions.

18. *The DEIS discusses in Chapter 2 in Sec. 2.1.5.4 the potential alternative of Integrated Gasification Combined Cycle technology. The DEIS states that IGCC was reviewed by SME in its 2004 Alternative Evaluation Study as well as by RUS and DEQ in the DEIS and that the technology was eliminated from further consideration because it did not satisfy the criteria of cost-effectiveness and reliability. The attached Whitepaper on IGCC contains references to additional studies and articles and provides an additional analysis of IGCC that support the conclusion in the DEIS regarding IGCC. We request that RUS and DEQ incorporate the additional information from the Whitepaper into the IGCC discussion in the DEIS, including the following point:*

“IGCC plants are very complex and are often down for repairs, resulting in a reliability factor of 80-85%, which is significantly lower than the reliability of a CFB plant (over 95%). During the period of down-time, it would be necessary for SME to procure power from the open market, resulting in higher energy costs as well as potentially increased air pollution, since the energy would likely be purchased from older, coal-fired plants with less efficient pollution controls. Thus, in addition to higher capital costs, the overall operating cost of an IGCC plant would be higher than that of a CFB plant and it could lead to increased emissions during the period of down-time.” C128

Response: Additional information on IGCC, as well as other alternatives, has been added to the alternative evaluation discussion for the FEIS.

ALT-306 ALTERNATIVES – OTHER POTENTIAL POWER PLANT LOCATIONS IN STATE

1. *Why doesn't SME locate the power plant closer to the source of coal so that it doesn't have to spend the money to transport coal? C9, C45, C266*

It is stated (page 2-53) that two 110 car coal trains per week will be used to transport coal to the Great Falls power plant site. It would appear that the alternative sites, which are much closer to the source of the coal supply for the power plant (Spring Creek and Decker Mines), could have an advantage with reduced costs of coal transport, and would reduce diesel railroad air pollutant emissions. We recommend that the evaluation of alternative sites address the following questions:

What is the mileage along the railroad lines that these coal trains will have to travel to transport coal to the Great Falls plant site vs. the Hysham, Decker and Nelson Creek sites?

Have the diesel fuel requirements and air pollution emissions and impacts from these coal trains, as well as the limestone and ammonia delivery aspects, been considered in the cost-benefit analyses and site selection criteria? C36

Response: The cost of transporting coal was one of many costs evaluated and compared by SME during the site screening and site selection processes. The cost advantage of shorter haul distances between the mine and the power plant with several alternatives was not enough to offset other disadvantages of these locations. Diesel fuel requirements were considered in evaluating the costs of alternative power plant locations. Air emissions from coal, limestone, and ammonia delivery were not considered significant.

2. *The DEIS states that alternative sites for the proposed power plant at Hysham, Decker and Nelson Creek are more expensive than the Great Falls plant sites, have a higher degree of risk associated with environmental permitting and approvals, and are subject to water disruption and lack of available water rights (pages 2-37, 2-38). The specific environmental permitting and approval risks at the Hysham, Decker and Nelson Creek sites are not clear, and should be identified and discussed in greater detail. C36*

In terms of screening out other coal-fired plant sites, it appears that the most crucial criteria was large quantities of water necessary for the CFB process, versus IGCC requiring 40% less according to the EPA and DOE. What criteria established that the Hysham, Decker and Nelson Creek sites were more expensive? C80

Response: Additional information from the Site Selection and Site Screening studies has been included in the FEIS.

3. *Why are we talking about Great Falls, when Colstrip is a lot closer? It seems it would be a lot more economical for everyone if they could just beef up the Colstrip plant. It would*

save on the rail transportation. They wouldn't have to build any new rails, and a lot of other places there. And the people that have been speaking have said that it doesn't bother them down there. C48

In my previous job doing NEPA, I concluded that when money is the driven force on a project, there's very little, very few alternatives selected. Okay. We heard another alternative here tonight, that is to expand Colstrip power plant. That's another alternative. That might be more feasible than building a plant here. C129

Response: Colstrip does not belong to SME, but to PPL Montana, so that this alternative would be that of purchasing power from another supplier who would have to expand their operations to meet SME's load. SME did not approach PPL about enlarging the Colstrip facility, but it has included PPL Montana in its efforts to meet its power needs through a traditional power purchase agreement. The costs quoted by PPL were market based and much higher than the project cost for HGS. Finally, not only is Colstrip owned by PPL Montana, but it is also an aging facility that would not have the same emissions control potential of the SME HGS facility. Further, the expense of modernizing Colstrip with up-to-date pollution control equipment, e.g., to meet Montana's new mercury limits, would further increase the cost of PPL power as compared to HGS.

4. *[At the Decker site] What is the estimated cost of 80 miles of new transmission lines and could SME apply for separate loans to build those lines under the REA? C80*

Response: The 2004 Site Selection Study estimated that the cost of constructing new transmission facilities for the Decker site was approximately \$87 million compared to about \$25 million for new transmission facilities for the Salem and Industrial Park sites.

ALT-307 ALTERNATIVES – NO ACTION ALTERNATIVE

1. *I (we) support the No Action Alternative. C8, C9, C10, C20, C24, C50, C58, C76, C98, C171, C266, C320*

The No action alternative is the only feasible alternative you should consider viable. C25

Response: Thank you for your comments. The No Action Alternative must be considered but it does not fully meet the benefits, purpose and need for this project. The agencies must consider the Proposed Action and any reasonable alternatives that could be developed that would meet the benefits, purpose and need for this project and address the issues raised during scoping.

2. *Since the DEIS states, “The No Action Alternative avoids most direct adverse environmental effects,” is not the DEIS admitting that the Proposed Option #1 is the only option that meets Montana Constitutional right to a clean and healthy environment? C8*

Response: The No Action Alternative does not fully meet the benefits, purpose and need for this project. The permitting processes are designed to be protective of the human environment and therefore comply with the Montana constitution.

3. *I do not believe the contention that the original electrical cooperative group would not allow the SME splinter group to rejoin the cooperative. In the “real” world of profit-motivated businesses, SME’s customers would not be left to “simply ‘do without.’” C50*

Response: Thank you for your comment.

4. *One thing the EIS I think failed on was showing the negative impacts if the HGS doesn't get built. Because if it doesn't get built, a lot of people are going to go back burning wood and coal. Power plants can burn coal and remove the pollutants. If residents didn't have electricity supplied by a power plant, they would go back to burning coal themselves and have no pollution control. I know a lot of our people would go back to coal. We've got a neighbor now that burns coal. On a cold winter morning, we can smell it a mile away. C57*

I will remind you that for every trillion BTU that comes out of this plant, because electricity cannot be stored, there's a trillion BTU that is not coming out of older, less efficient plants. You alluded to that a little bit earlier, when you talked about, if there's an alternative, one of the alternatives is to do nothing. That has environmental impacts too in other places. C115

TO DO NOTHING would be nothing other than an attempt to rely on existing, older models of coal fired generation. This can only result in greater emission problems than now exist from these existing plants. This would be an irresponsible and environmentally dangerous route to follow. C130

It is noteworthy that the need for a power supply for the 5 electric coops will not go away. If they are not supplied by the HGS, they will probably be supplied by another coal fired plant out of state whose environmental controls will not even come close to those proposed for the HGS. C306

Response: The EIS includes a discussion of a range of impacts that would occur if the No Action Alternative were implemented. No doubt there are some impacts such as people burning wood and coal to heat their homes instead of using electricity that were not discussed because it was not thought to have a high probability of occurring or on such a scale as to constitute a major environmental impact.

5. *The DEIS is correct in its first assumption in its no action alternative and recognizes that is not strictly necessary for SME to build this plant. The DEIS correctly states that it is unreasonable to assume that the city could not get power for its customers from some other source. C77*

Response: Thank you for your comment.

6. *[With regards to the No Action Alternative] Where are the facts or detailed assumptions of how SME would impact other communities and generating sites? C80*

Response: Section 2.2.1 discusses the assumptions made for the No Action Alternative. No specific communities and generating sites are identified because the power could come from a variety of energy sources and locations. Therefore, the discussion of the impacts was generalized.

7. *One of the alternatives considered in this DEIS is that of not building the plant. I believe the comments under that heading are also biased. While it does admit that not building it would result in no negative impacts locally, it goes on to say essentially that the power that we here will be using has to be generated somewhere, and wherever that power is generated will have negative effects on that locality. In the first place, this is very misleading and places a falsely negative light on not building the plant. Such power as we will be using in case of the plant not built is essentially the same as the power we are using now. Not building the plant will not increase a negative effect. C111*

Response: Currently the power obtained by SME is primarily generated by hydroelectric dams. If they had to obtain power generated at other coal fired power plants, a portion of the environmental impacts generated by those plants would be attributable to SME's use. It is also likely that SME's need would result in the expansion of one or more of those power plants to handle the increased demand attributed to SME's growing need for power over time. Therefore, the No Action Alternative would result in impacts in other locations in order for other power plants to supply the electricity that SME's customers consume.

ALT-308 PROPOSED ACTION – HIGHWOOD GENERATING STATION

1. *This coal plant will be very costly. It has already cost the tax payers of the city a great deal just to navigate the early stages of the presentation. C1*

Response: Thank you for your comment. It is not the purpose of this EIS to address costs incurred by the city during negotiations with SME and its effect on tax payers.

2. *This project is both a short-term and a long-term economic boost to the community and the surrounding areas. It is something that is sorely needed in Great Falls. C2*

This is a Montana project owned by Montanans, using Montana coal and limestone, to generate power that stays in Montana. C2, C5

The plant that we're building is modeled after the Gilbert station, a power plant that is a CFB plant in Millville, Kentucky. It was recognized as the cleanest power plant in the United States last year. We will be, if not the cleanest, the second cleanest power plant, when we are on line. C6

As the future home for this power plant, as well as being one of its owners, we're doubly concerned that it use the best available technology to provide the cleanest, possible coal generated electricity. We believe your draft environmental impact statement demonstrates that these goals will be met. C19

The city is looking forward to a clean, modern electrical generating station to provide cost-based power for its customers and the customers of our co-op partners. We very much appreciate the Rural Utilities Service and the Department of Environmental Quality's efforts to oversee a fair and impartial process to make sure that our goals of the environmental protection are met. C19

Southern Montana Electric G&T has expressed a desire to utilize Montana resources to the extent possible. As a result, it is possible that Rio Tinto Energy America's Spring Creek coal mine could become a major supplier of Southern Montana Electric G&T's energy needs. RTEA is committed to being a part of the long-term prosperity and outstanding environment of the State of Montana. Recent multi-million dollar investments in the Spring Creek Mine demonstrate RTEA's commitment for long-term investment in Montana, facilitating future supply of low sulfur, low mercury coal from the State. C114

Response: Thank you for your comments.

3. *To approve construction of a CFB plant would violate Montana's Constitutional provision to provide a "clean and healthful environment." C8*

I feel this plant is too detrimental to the land and the health of the Montana people. C60

Response: The permitting process and standards are designed to be protective of human health and the environment and therefore comply with the Montana constitution. SME has applied for permits and volunteered for a waste disposal license that will satisfy the processes and the standards implemented therein.

4. *The best CFB technology does not meet CAA requirements because even the best CFB technology no longer meets acceptable standards for maintenance of a healthy environment (BACT). C8*

We do not like the reliance on coal--ugh--or the pollution that the plant will cause. C32

The EIS for SME's HGS clearly shows that this power plant will be a substantial source of new and hazardous air and land pollution. This power plant does not comply with the directive of the NSR program to assure people "that any large new industrial source in their neighborhoods will be as clean as possible." C50

I believe the Highwood Station proposes to generate unnecessary power at too high an environmental cost. The risk of pollution, particularly from mercury, in a productive agricultural area doesn't warrant building a coal-fired plant. C98

I am concerned about the proposed Highwood Generating Project. The last thing Montana needs is more toxic air pollutants, mercury, and global warming pollutants added to our fragile environment. If we pollute our air, land, and water with a plant that is not needed and uses outdated technology, we endanger the health of Montana's citizens. And Montana cannot continue to become an economic powerhouse through outdoor recreation if we damage the environment. C113

Response: The emission limits imposed under Montana's Clean Air Act would ensure that the air, land, and water are protected from criteria pollutants and hazardous pollutants such as mercury. Some greenhouse gases such as NO_x are regulated. While CO₂, another greenhouse gas, is not regulated under federal or state law, SME has voluntarily committed to mitigations to offset some of the emissions.

5. *Because of this impracticality and expense of hauling coal on captive rail lines, we are concerned that once built, the Highwood coal plant will petition for an amendment in its air quality permit in order to combust the lower quality, more highly polluting lignite coal that is abundant in north central Montana. C20*

Response: SME has never stated or implied to DEQ or RUS that it would use lignite at HGS. In the event that SME ever decided to pursue lignite, a lower BTU coal, as a fuel, it would have to apply for a modification to its air quality permit. Appropriate limits would be determined and the public would be allowed to comment on the permit modification before it was finalized.

6. *At the first October 13, 2004, “Open House” I was informed that the HGS would be “clean” coal burning by city officials and SME employees. Since then I discovered that CFB was an outdated technology and that there was a much cleaner coal burning facility available. Repeatedly, I have [brought] this to the attention of city government officials, but I was informed that the decision had been made for this type of plant. They felt that it could not be funded and to install the proper filters would add unwanted costs to the production of electricity. Other generation alternatives would not be competitive when they tried to sell the surplus out of state. City officials maintained that other alternatives to coal burning such as wind generation would be too expensive. C29*

Response: CFB is not an outdated technology and it is capable of meeting all air quality emission standards. The proper emission control technology would be installed as a requirement of the air quality permit. The Proposed Action does include four wind turbines capable of generating 6 MW of electricity.

7. *I wish to express my opposition to the proposed coal plant near Highwood. In the March 2006 issue of the National Geographic, it was made clear that there are no clean coal plants. There are two in the United States that are relatively clean, but the cost is so prohibitive that that kind are not the ones being built. C33*

Response: Thank you for your comment.

8. *Figure 2-23 (page 2-48) provides a map showing the plant sites and potential routes of rail lines, transmission lines and water pipelines. It would be helpful if an enlarged map or maps identified all project facilities and appurtenances and facility routings that would require ground disturbances, including proposed new roads, transmission lines, rail lines, underground cables, pipelines, wind energy facilities, etc., to allow clearer understanding of the locations and potential impacts of these facilities and routings. It would also be helpful if sensitive environmental features that may be impacted at these specific sites and routes were more clearly described and/or summarized (e.g., wetlands, springs, seeps, stream crossings, important habitats, etc.). C36*

Response: DEQ and RUS find there is no need to include additional information to Figure 2-23 in the DEIS (now Figure 2-25 in the FEIS). This is a general overview map. This map in conjunction with the site plan maps and resource maps and figures in the EIS allow the public to identify the locations of all facilities and resources. Versions that are 11 x 17 inches are included in the CD version of the DEIS and FEIS.

9. *Why not build the stack 25 foot high instead of 400 and some feet high and dump the air pollution on these Great Falls people instead of up on us up here C47.*

Response: The chimney must be a certain height in order for the emissions to disperse and meet ambient air quality standards.

10. *I live on Salem road approximately 2 miles from the proposed site and not one person*

has ever stopped by to talk to me about the sight? I can't believe nobody took the time to stop by and talk to the people that live on Salem Road? Amazing... I won't even get electric from the thing 2 miles down the road and yet I get to suffer with the pollution? Just does not seem fair. C61

My family farms east of Great Falls, adjacent to the Urquhart farm where the plant is going to be located. I didn't see any engineers out there estimating the environmental impact on the power lines that are going to be running through our place. We're going to have several of those towers, and they're going to impact the environment pretty good. But I guess in the name of progress, that's probably all right, but is this really progress? I believe it's a step backwards. C76

Response: Opportunities for public involvement have been made available to all local citizens. The exact location of the transmission line has yet to be finalized, but SME would have to obtain landowner consent. Based on state law, Electric City Power cannot compete with the default supplier for residential power. Until that changes, residents would not be able to take advantage of the power generated at HGS.

- 11. How can this, the Salem or Industrial site options, be the 'best' when you consider that each has ten or more 'Adverse' classifications of 14 key areas examined? How many of the many alternatives screened out were categorized in the same manner and how many had fewer adverse findings? C80*

Response: Just because an impact is considered to be adverse does not mean that the impact would be considered significant, long lasting or major. There are other criteria which have to be considered as well. The alternatives analysis is not done to the same level of detail with the alternatives considered and dismissed as with the alternatives considered in detail. However, the FEIS does include additional information regarding other sites in the Great Falls area and the rationale for their dismissal.

- 12. How are the 'connected' actions figured into the final cost estimates, and has the increased costs of fuel been considered in ALL transportation costs, whether diesel fuel for trucks hauling limestone, or locomotives hauling coal into HGS? C80*

What construction costs have increased and is the 515 million dollar estimate accurate, especially for labor costs, fuel costs and other commodities? C80

Response: The economic analysis that SME is required to do for its loan application must include all of these costs, and these costs are continually reviewed by SME and periodically updated with RUS. Any increase in construction costs over the original estimates must be reviewed by RUS and accepted as part of the final loan approval process.

- 13. How many construction and operator jobs are created by the four wind turbines at the*

HGS-Salem site and what economic benefit will that offer? C80

Response: No additional personnel for maintenance/operation of the wind turbines would be needed as the HGS plant staff would be utilized.

14. How many easements has SME actually negotiated with local landowners? C80

Response: Although the routes of the proposed transmission lines are needed for impact analysis, the knowledge of easement negotiation is not. Easements would be negotiated once a decision has been rendered by the agencies.

15. Page 2-1, first paragraph, sixth line. The size of 250 MW should be noted as “net” capacity output. C128

Page 2-1, first paragraph, last sentence. Add that an additional 6 MW of wind power will be a connected action. C128

Page 2-52, third paragraph, last line. Delete the word “...the...” in front of “authorities.” C128

Page 2-56, the only paragraph, first line. Revise the maximum amount of water to be consumed from 3,500 to 3,200 gallons per minute. Also, revise the maximum amount of water to be consumed on a million gallons per day and acre-feet per year basis to agree with the 3,200 gallons per minute. C128

Page 2-57, the first two lines. Either delete “...either discharged as return flow or...” or add a clarification that the Proposed and Alternate Action will recycle the water to the cooling tower. C128

Page 2-57, third paragraph, seventh and eighth lines. Revise as follows “...and cooled as it is removed in the water cooled bed ash screw conveyors...” C128

Page 2-57, third paragraph, ninth line. Revise as follows “...mixed with wastewater and wastewater sludge to control dust...” C128

Page 2-57, last paragraph, next to last line and last line. Revise as follows “...The sediment concentrate resulting from the raw water treatment process would be injected into the fly ash and bed ash pug mills to control dusting.” C128

Response: These editorial changes have been incorporated into the FEIS.

16. I'm the general manager of the Tongue River Electric Co-op in Ashland, Montana. We have about 10 to 12,000 residents in our area where we serve power. And we evaluated all of the options when BPA said that they would no longer sell us clean, environmentally sound power after 2011. And our engineering team came up with the Highwood Generating Station as the best option. This is a better option than buying power from

PPL in Colstrip, and it's a much better option than buying coal-powered generation from out-of-state source where Montana DEQ can't study their emissions and do any controls. C142

Response: Thank you for your comment.

17. The Missouri River is Great Falls' single most valuable asset for attracting business to this city—not for its power or water, but for the graciousness and beauty it gives to this city and for the recreational opportunities it affords us. The area of the river near the proposed coal plant site is used for whitewater rafting, canoeing, camping, fishing, and kayaking. It is the closest area to Great Falls suitable for some of these activities. C152

Response: Thank you for your comment. Looking at the attractiveness of Great Falls for new businesses is outside the scope of this EIS. Impacts on recreation are discussed in Section 4.8 of the FEIS. The construction and operation of the HGS would not have any effect on recreational use of the Missouri River either above or below Morony Dam because of the HGS would not be visible from river. This would be due to a combination of the height of the riverbanks and the distance of the proposed power plant from the river.

ALT-309 ALTERNATIVE SITE – POWER PLANT AT INDUSTRIAL PARK

- 1. Coal plants belong in industrial sites, not on prime rangeland adjacent to the Missouri River. This coal plant establishes a precedent for “finger annexation” of Cascade County agricultural property by the City, hardly something to be encouraged by the USDA. Indeed, if we have to have a coal plant, a more modern IGCC facility could be placed in the Industrial Park north of town that was created for this purpose. C20*

Response: The annexation of industrial sites is an issue between the city and the county. The USDA had no involvement in this issue. The Industrial Park Site is fully analyzed in the FEIS in Chapter 4. The Salem site remains the preferred site. Refer to ALT-305 to review responses to other comments on IGCC. The FEIS contains additional information on IGCC technology.

- 2. If the Industrial Park site is the final site selected, how will SME integrate wind energy (since Industrial Park has no wind turbines) into its power supply portfolio as set by the Montana legislature? C80*

Response: SME would have to evaluate alternative sites to add wind power to its supply portfolio if the Industrial Park Alternative were selected.

- 3. As with the HGS-Salem site, how many LOCAL workers would actually be employed of the 300-400 on the Industrial Park site at any one time, up to 550? C80*

Response: Employment figures are identical at both sites.

- 4. Why haven’t the locations of the transmission lines, water and wastewater lines [for the Industrial Park Site] been determined? C80*

Response: General locations were provided in the DEIS. More specific locations have been included in the FEIS (Figure 2-24).

- 5. Where will fly and bed ash be sent to for disposal, since the county landfill is not an option? C80*

Why will an ash disposal site NOT be constructed on the site and cannot a site be built there despite space constraints? C80

Response: There is not sufficient space at the Industrial Park Site to construct a monofill as is proposed at the Salem site. The fly ash would be disposed of at a licensed landfill such as the High Plains Sanitary Landfill.

- 6. What complications might occur with the proposed rail spur and existing rail lines leading to the malting plant (IMC), since there is an outstanding dispute on cost share of the IMC rail spur with the City of Great Falls? C80*

How will new track and railbeds be integrated with neighboring facilities like IMC, with it still disputing the cost of their rail spur, and how could this effect other commercial developments in the industrial park being planned? C80

Response: There is a cost to building a rail spur. SME would need to work with the City of Great Falls and other users of the Industrial Park to eliminate or reduce conflict.

7. *If the HGS-Salem site was disqualified, how would SME mitigate the noise and air pollution created by coal trains entering the city limits of Great Falls? C80*

Response: Trains going through the City of Great Falls have to comply with regulations regarding speed, which is a factor contributing to the noise generated by train traffic. The noise analysis conducted concludes that the trains entering the Industrial Park Site would not generate noise exceeding the City of Great Falls Code requirements. Therefore, no noise mitigation would be required. Diesel locomotive emissions are regulated by EPA.

8. *Page ES-12, second paragraph, fourth line. Delete the phrase "... and wind turbines...." because no wind turbines are planned for the Industrial Park site. C128*

Page ES-12, third paragraph, third line. "...The Proposed Action would temporarily displace terrestrial wildlife...". Add to this statement the fact that the Industrial Park site has been developed and displacement of wildlife would be a low probability as the area has been partially developed, which previously displaced the wildlife. C128

Page ES-12, third paragraph, line 7. "...as well as minor, localized short-term harm to aquatic biota from degraded water quality." This impact (and a couple others) described for the Industrial Park Site are not presented in Table 2-13, page 2-74. C128

Page ES-13, last paragraph, second sentence. "...Construction of a power plant at this site would involve the direct conversion of agricultural lands to an industrialized facility with supporting infrastructure..." Also add that the industrial site is intended for this type of use. C128

Response: The appropriate editorial changes have been made in the FEIS.

9. *There are also long term business planning reasons to group industry—transportation costs such as railroads and highways, land values, positive use of byproducts in other nearby plants, carpooling of workers, resource management. If this plant has too much pollution to be in one of these parks, then it has too much pollution period and less polluting technology must be utilized. C152*

Response: The emissions from the Industrial Park Site would be regulated just as they would be from the Salem Site to comply with state law.

10. I would like to suggest that the alternative site is more desirable as a site than the primary site near the Highwoods. This site would have no effect on the historic Lewis and Clark Trail and would have no adverse effect on the scenic Highwood Mountains....I see no reason why wind generators could not be included at this site as well. C251

Response: Thank you for your comment. In the EIS, DEQ and RUS find that constructing the project at the alternative site, which is at some distance from the Great Falls Portage Route NHL, would avoid the level of adverse impact of the Salem site on the NHL. However, the HGS located at the Industrial Park site would still be visible in the distance from the NHL, much as the malting plant is today. After review of the Industrial Park site, it was determined that the available acreage at that site is not of sufficient size to also accommodate wind turbines.

ALT 310 SALEM SITE ALTERNATIVES DISMISSED

1. *Page 2-39, first bulleted paragraph, fourth line. Remove the phrase "...watering lawn areas, and..." C128*

Page 2-40, fifth paragraph, third line. Please remove the option of "...or with wastewater discharged to the Missouri River from the plant site in accordance..." because inclusion of sanitary wastewater was not considered part of the option of direct return of wastewater to the Missouri River. The preferred option is to return the sanitary wastewater to the City of Great Falls. C128

Page 2-40, last paragraph, last sentence. SME anticipates minimal operation and maintenance costs and does not believe we will need a licensed operator for a septic system, if one was installed. C128

Page 2-41, second bulleted paragraph, last line. Add the phrase "...and routing HGS-related coal train traffic through the City of Great Falls, where some residents have expressed concerns about wait times at existing at-grade street crossings...." C128

Page 2-41, last paragraph. Correct the spelling of "High Plains Landfill." Also, add the fact that hauling ash to the High Plains Landfill will increase truck traffic through the City of Great Falls from the Salem Site as the landfill is North of Great Falls. C128

Response: Appropriate editorial changes have been made in the FEIS.

STG-400 SOILS, TOPOGRAPHY AND GEOLOGY

1. *Proper Best Management Practices (BMPs), and other mitigation measures implementation and maintenance are very important, and impacts can be avoided or minimized if BMPs and other mitigation measures are properly implemented. Details should be provided for accomplishing these activities in the EIS. Also, it is important to specifically designate the entity (e.g., USDA RUS, SME, contractors, or some combination) in charge of BMP implementation, which will have specific enforceable accountability. In addition, the BMPs, mitigation measures and other related activities require inspection, documentation and record keeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. C36*

Response: During the construction period, the plant will require coverage under the General Permit for Storm Water Discharges Associated with Construction Activity. This permit is issued under the Montana Pollution Discharge Elimination System administered and enforced by the DEQ Water Protection Bureau. A site specific Storm Water Pollution Prevention Plan specifying BMPs is required. Once construction is completed, the plant will require coverage under the General Permit for Storm Water Discharges Associated With Industrial Activity or a site specific Industrial Permit. These are also issued by the same DEQ bureau. Recordkeeping and reporting are also required by all these permits and the sites are inspected by trained DEQ staff. See also Section 4.3.2.1 of the DEIS for a further discussion.

2. *Appendix J talks about the definition of significance when it deals with soil contamination. And I see under major it says leaching of contaminants causes water quality degradation and health risks as defined for surface water and groundwater degradation major. I would say that this is not an adequate definition of significance when it comes to what is going on with soil contamination in the area of the plant. And, as a result, the DEIS is insufficient. C78*

Response: SME submitted a No Migration Demonstration for the ash monofill to DEQ. The information submitted demonstrates that based on the unit design, the nature of the ash, and the soils and hydrogeology of the site, there would be no migration of contaminants from the waste management unit to the underlying aquifers. Class II landfills that meet the requirements of the No Migration Demonstration found in ARM 17.50.723 are exempt from liner and groundwater monitoring requirements. SME has voluntarily agreed to construct recompacted clay liners in the waste management cells and to monitor the underlying aquifer as part of an ongoing demonstration. Since no groundwater contamination is anticipated to occur, there would be no degradation. As the ash dries, it would form a hard, lightweight cover similar to concrete; in this form, the ash would not be subject to wind erosion and offsite deposition. Also, see response to Comment 3-400 below regarding deposition from chimney emissions.

3. *We have in this area some of the finest farms growing some of the most important crops, wheat, in the area. In fact, it's known as the Golden Triangle. I would submit that unless there are measures of what the soil has by way of contaminants that would be coming out of this plant so you can compare it to the contaminants that are coming and falling from this plant, you really don't have an adequate measure to determine whether or not what the plant is doing is significant or not. I know for a fact, because I'm an attorney, that I have several major clients within five to ten miles of this plant that do organic farming. What would be the effect on their organic farming or organic cattle as a result of the things that are going to be dropped into the ecosystem? This hasn't been answered by the DEIS, and to me it is a major failing and needs to be considered. C78*

Response: Montana's PSD permitting regulations require that the impacts of a proposed plant's projected emissions on soil and vegetation be evaluated. The primary NAAQS for criteria pollutants were developed to provide adequate protection of human health, while the secondary standards were designed to protect the general welfare, i.e., manmade and natural materials including soils and vegetation. EPA's guidance on new source review states: *"For most types of soils and vegetation, ambient concentrations of criteria pollutants below the secondary national ambient air quality standards (NAAQS) will not result in harmful effects."* The results of the air quality analysis demonstrate that the impacts of the HGS plant would be less than the PSD modeling significance levels, which are more conservative than the NAAQS and MAAQS. Therefore, our understanding is that the operation of the proposed plant should not have an effect on the organic status of the farms.

4. *What provisions have been made for not only soil contamination monitoring, but for surface water, particularly as airborne contaminants could be landing on soil and surface water downwind and downstream of either site? C80*

Because soils contamination from chimney emissions is not expected to be a significant problem, no soils monitoring in the vicinity of the HGS is proposed at this time. In addition, because there is no discharge of treated plant effluent into surface waters, no surface water monitoring is proposed.

5. *Page 4-13, second paragraph under Operation, fourth line. Add language to the existing line which states "...could flush heavy metals such as arsenic and lead..." which indicates that the leaching tests on the ash show no to very low concentration of specific metals will leach and if any leachate was produced, it would be magnitudes lower than the standards for drinking water. C128*

Response: The pertinent text in Section 4.3.2.2 has been changed to read as follows:

"...The water would run off these piles or through the ash waste and could flush heavy metals such as arsenic and lead, which are inherently present in coal in trace amounts, into nearby soils where they could be adsorbed as the water slowly infiltrates down through the soil column. Leaching tests on the ash from proposed

coal sources show no to very low concentration of specific metals will leach and that if any leachate was produced, it would be magnitudes lower than the standards for drinking water. ~~However,~~ **Additionally,** given the great depth to groundwater and the impermeability and thickness of clayey soils on site, the potential for extensive contamination problems is regarded as very low.” Go to Section 4.13.2.2 for more information on ash disposal.

WAT-500 WATER RESOURCES

1. *Both proposed plant locations drain toward the Missouri River and are subject to wind erosion (causing particle distribution), thus posing undue risks both to the Missouri River and to the city of Great Falls. Therefore, these locations cannot meet Federal standards. There are already several toxic waste sites in the Great Falls area; we need to concentrate on cleaning these up, not creating another. C8*

Both the proposed landfill at the Salem site and the Montana Waste Systems landfill meet all Federal and State locational standards.

2. *Some confusion exists about water discharge plans. At the Havre DEIS hearing, SME officials twice testified that no waste water would be emitted in the plants' operation, except the typical human waste products. Yet, three months previously SME Representative Tim Gregori said that waste water would be processed by the Great Falls Municipal Water Treatment Plant (WTP). It is doubtful that the WTP has the capability adequately to eliminate mineral and other water-borne and water-soluble contaminants. Whether discharge from the WTP will fully comply with these regulations needs to be verified. Also, the possibility of accumulation over the life of the HGS of toxic material behind the Missouri dams is a concern that needs to be examined. C8*

Is the R.U.S. going to permit water discharge containing heavy metals, poisons and other pollutants from the coal plant to enter the City of Great Falls sewage treatment plant, which will be cycled by the sewage plant and returned to the River? C14

Where is a list of all the chemicals discharged into the water being sent to the City? What percent of these chemicals will be discharged from the sewage treatment plant into the Missouri River once the Highwood Plant is operational? Does the City have the expertise, equipment and the permits to handle this type of industrial pollution? C14

Pretreatment requirements for the city's wastewater treatment plant, including limits on heavy metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, silver, zinc), and wastewater sampling and monitoring would need to be met. We are pleased that the DEIS discloses HGS requirements under the Industrial Pretreatment Program (page 4-24). We note that the generating station will need to meet the pretreatment standards for new sources, Steam Electric Power Generating Point Source Category, 40 CFR 423.17, and will need to obtain an Industrial Storm Water Permit from the Montana DEQ (contact Mr. Brian Heckenberger of MDEQ in Helena at 406-444-5310 regarding storm water permits). C36

How would SME reduce wastewater discharges into the city's treatment facility if it ever exceeded the maximum allowable industrial loading numbers for heavy metals? What is the possibility of mercury residue being processed through the city's treatment facility? C80

Response: The HGS would meet the pre-treatment requirements of the WTP. The estimated effluent quality is substantially lower than the maximum allowable limits, which would minimize the need for pretreatment most of the time. The estimated mercury loading is 0.002 lb/d compared to 0.39 lb/d for the maximum allowable industrial loading limit. In addition, the WTP has to comply with its MPDES permit discharge limits; RUS does not have permitting authority regarding discharge limits. This would prevent the discharge and accumulation of toxic substances into the Missouri River. The plant operators are licensed and certified in the operation and monitoring of the waste water treatment plant and would be capable of handling the additional input of the effluent from HGS regardless of its chemical constituency.

3. *The DEIS Alternatives #2 & 3(Proposed Action and Alternative Site) propose to usurp about 80% of the water rights on reserve for the City of Great Falls. To squander these rights on an archaic coal plant is to do a considerable disservice to the citizens of Great Falls. C8, C125*

It is also reasonable to ask why the plant is being sited in Great Falls instead of the Billings area. The primary reason appears to be the availability of water, thanks to the generous water rights owned by the City of Great Falls. The City is understandably anxious to prove up on these water rights, since in these drought stricken times the value of the water is readily apparent. The coal plant will use up to 3200 gallons per minute (half of what the entire populace of Great Falls uses on a winter day). Most of the 1.7 billion gallons per year will be evaporated, making it unavailable for agriculture and contributing to visual haze. It is surprising to us that the Department of Agriculture, knowing the importance of water to farming, would collaborate in this unnecessary squandering of our precious water resource. It is also surprising to us that our City, with its hefty water bills to area consumers, would sell the water to a coal plant at markedly reduced rates. Wouldn't it be better to use this water instead to support a biodiesel or biomass electric generating facility? Won't the use of this water by SME be detrimental to downstream agricultural, tourism, fishing and barge industry interests? If a coal plant has to be built, wouldn't it make more sense and in the end cost far less for SME to purchase ranches with ancient water rights for a location along the Yellowstone River, which is closer to both the coal and its customers? C20

I hear that plant would also waste more than a billion gallons of water from the Missouri River every year. With the climate heating up, (this is the hottest summer I can remember) people will need water to drink and the Missouri could be a vital source. C35

The HGS will use far too much water from the Missouri, where do they get the water rights unless you guys give them to them. The DEIS doesn't address water usage concerns adequately. C55, C58

The 5,600 acre-feet per year that the plant would use would meet the municipal demands of 28,000 people. The economic analysis in the EIS relies upon a substantial population increase to serve as a market for the power produced by the proposed plant. But water

availability is already a major factor limiting population growth in Montana, as evidenced by the increasing difficulties encountered by subdivision developers in obtaining new water rights. Thus, the water rights claimed by SME for the power plant could conceivably preclude the population growth needed to make the same plant economically viable. Although the water right from Morony Reservoir is legally available for use by the proposed power plant, the EIS should consider whether that is really the most beneficial use of that water. C71

At 3,200 gallons per minute (DEIS, page 4-22), Highwood would be removing 1.7 billion gallons from the Missouri River each year – enough to meet the domestic water needs of 26,000 people. C95, C134, C165

Water is too precious and there are many downstream needs for the water that would be consumed by this power plant. The EIS states that this plant could use up to 3500 gallons per minute or 5600 acre feet per year. When I get a water right for a well the state limits me to .017 acre feet per cow per year. This would be enough water to supply over 329,400 cattle with water for one year. We need to conserve water, not unwisely waste it. C104

The waste of water begins with mining the coal, which in Montana means mining the aquifer, and drawing down or polluting or otherwise damaging the wells and springs so vital in our semi-arid country. Using Missouri River water within the plant (thanks to the water rights of the City of Great Falls) to boil water to steam to spin turbines, and for cooling purposes, means that nearly 90% of that water will evaporate away. Each day the Highwood plant would consume about 4.6 million gallons of water -- half of what the entire City of Great Falls uses on a winter day. C155, C334

The consumption of the water from the Missouri River will adversely affect our community which depends not only on agriculture but also on the recreational aspects of the river. The river is our lifeline. C175

An annual consumption of 1.7 billion gallons of water from the Missouri River is reason enough to say No! C239

We just came out of a 10-year drought. Is taking 1.7 billion gallons of water from the Missouri a smart decision? C302

I doubt whether or not there is sufficient water available for this type of power plant. Does the developer(s) have the necessary water rights? Have those rights been adjusted? I cannot believe there have been no water rights objections filed. DNRC needs to conduct a separate EA, at a minimum strictly assessing the water right or change of use for a water right. C312

As mayor of Fort Benton, a small community 20 miles downstream and downwind of the proposed generation facility, and as a farmer who relies on the Missouri river for water necessary to irrigate my crops, I have [a] serious concern about increased consumption

of water from the Missouri. C315

The news media continues to predict that the next crisis we will face is water shortages. An evaluation of the long-term economic sense of utilizing CFB technology which requires considerably more water than the utilization of IGCC technology would certainly be warranted. C318

A second concern to me is the use of water in the process. Water is scarce in these parts and use of it in the manner indicated is contrary to the best use of a scarce commodity in our state.... C325

It appears that use of Missouri River water is the pivotal reasons for this plant being built at G.F. C333

Water is a precious resource in our region. In an over-appropriated Missouri River Basin, we must be especially cautious and conservative in how we allocate new uses. What is the value of this water, and what future needs (population growth, bio-energy crop production, added-value resource industries, recreational fisheries, etc.) will be precluded by sequestering it off to a polluting power plant? The DEIS is silent on this issue. C334

Response: The City of Great Falls has applied to the Department of Natural Resources and Conservation (DNRC) to change its municipal water reservation to accommodate water use at SME's plant. The application was public noticed on June 6, 2006, and one objection was received. A contested case administrative hearing is scheduled to take place in January, 2007. DNRC will base its decision to grant or deny the City of Great Falls' water right change application on the statutory criteria found in MCA 85-2-402. Among other criteria, the applicant is required to prove that existing water rights will not be adversely affected by the proposed changes. However, an applicant is not required to prove a lack of adverse effect to future appropriations of water.

SME's proposed appropriation of water includes a flow rate of 7.13 cubic feet per second, and a volume of up to 5,161 acre-feet per year. This appropriation will utilize up to 62 percent of the flow rate and 86 percent of the volume of Great Falls' municipal reservation of water. Per the July 1, 1992 Board of Natural Resources and Conservation's Final Order in establishing water reservations in the Missouri River basin, the term of applying the City of Great Falls' reservation to beneficial use is to the year 2025.

Water rights in the State of Montana are operated under the prior appropriation system. Every water right/reservation is assigned a priority date, and that date, along with water availability, dictates the period when a water right can be exercised. If the City of Great Falls is ultimately successful in obtaining authorization to add SME's plant to its water reservation, the plant will operate under a 1985 priority date. In the future, if senior water users are being adversely

affected by SME's diversion, HGS may be shut down until water conditions improve.

4. *If the water must be taken out of the Missouri River and mostly evaporated by the coal plant, why doesn't the R.U.S. insist that "Discharge" water from the City of Great Falls Sewage Treatment Plant be used before it enters the River instead of taking out water downstream (which includes a substantial contribution from the much purer water from Giant Springs)? C14*

PPL Montana would prefer that water not be removed upstream of its hydroelectric dams. Taking water from the water treatment plant would remove water from those dams although not a significant volume in terms of flow as described above in WAT-500-3. The quality of the water from the wastewater treatment plant would require additional treatment to be suitable for use in HGS. SME would need to install an additional and longer pipeline to pump water back to HGS in order to use treated waste water from the plant. The volume of the treatment plant would not be sufficient to meet HGS needs requiring a second pipeline to bring water from the Missouri River.

5. *Even if ash is not dumped directly into the river, how is this going to affect the groundwater? C27*

We recommend additional mitigation measures for protection of the Kootenai aquifer underlying the proposed ash disposal and evaporation pond sites. This could include a poly liner above the compacted clay layer at each site, as well as installation of a leachate monitoring/collection system beneath the liner. This would allow collection of leachate should groundwater monitoring show leachate contamination. Since the Kootenai aquifer is used for public water supply this would appear to be a prudent course of action, as it is difficult to remediate an aquifer once it becomes contaminated. C36

In my opinion, the consideration of water-quality impacts in the EIS verges on cavalier. To say that clay soils and liners will protect water quality from leachate and runoff from boiler blowdown, coal piles, cooling process and boiler cleaning wastes, and fly ash is to ignore acres of grossly polluted ground water at Colstrip. But unlike Colstrip, which is located far from surface water, contaminants from the proposed Highwood facility would discharge almost directly into the Missouri River. Neither clay soils nor compacted clay liners have ever been shown to be leak-proof.... If developed, the proposed facility would almost certainly pollute both ground and surface water – an inevitability that the EIS casually discounts. C71

...the risk of potential pollution of groundwater cannot be ignored. C325

Response: In the "No Migration Demonstration" submitted to the DEQ as part of the Solid Waste Management System License Application by SME, data were presented to the DEQ on the test results for the hydraulic conductivity of the ash

and the soils, the concentrations of the metals in the ash and in leachate produced from the ash. Based on these numbers, a numeric model was run using a worst case scenario. Even using these conservative conditions, solute concentrations are below the limit of detection at a point 60 feet below the ground surface for 65 years. The glacial tills beneath the site are estimated at 110 feet thick. Then it is another 140 feet through a confining shale layer to the uppermost water in the Kootenai Formation. For modeling purposes, the top of the Kootenai was used as the top of the aquifer, adding another conservative parameter. No liner was included in the model.

Since the ash produced at the proposed plant would be in a dry form rather than a wet slurry like some other plants, the hydraulic loading on the liner is minimized. The ash would have a hydraulic conductivity of about 0.0158 feet per day and the glacial till clay was assigned a value of 0.00023 feet per day, an order of magnitude faster than the lab determined permeability. The metal content of the ash leachate (TCLP) is less than 0.5 parts per million for all metals except barium, so the concentration of 2.0 parts per million, a little above the highest barium concentration of 1.6 ppm, was used in the model. The TCLP limit for barium is 100 ppm. The highest mercury concentration was 0.0024 parts per million and the TCLP limit is 0.2 parts per million for mercury. Total metals in the ash are less than half of one percent.

In short, the model demonstrates that the landfill would meet the requirements that the groundwater at the point of compliance will not be contaminated for the life of the landfill units and the post closure care period. (See ARM 50.723(3).)

The nature of the soils at the Salem site and the confined nature of the Kootenai aquifer preclude the need for a liner for the landfill; however, groundwater monitoring wells would be installed to verify that no contamination of the aquifer beneath the plant occurred.

6. *The two figures showing ground-water elevation contours for the Kootenai Formation (figure 3-9) and Madison Limestone (figure 3-10) show identical contour lines with the same observation wells and ground-water elevations indicated on the figures. C28*

Response: Thank you for noticing this typographic error. The Figure 3-9 for the Kootenai has been corrected.

7. *The reference to figure 3-8 is incorrect; presumably the reference should be to figure 3-11. C28*

Response: Thank you for noticing this typographic error. It has been fixed.

8. *It would benefit the public and reviewers if the locations of the Salem and Industrial Park sites, as well as major streams discussed in the text, were shown on figure 3-11. C28*

Response: Figure 3-11 has been revised to include the two sites, Missouri River, and Belt Creek.

9. *Pumping 3,200 gpm through a 20-inch diameter pipeline will produce an intake velocity close to 3 feet per second, far exceeding the 0.5 feet per second impingement velocity that is the maximum allowable, according to the draft EIS. C28*

Response: The diameter of the intake screen to be installed on the pipe extending into the river would be sized to meet the impingement velocity requirement and address Clean Water Act requirements.

10. *While the DEIS indicates that “there would be minimal loss of wetlands and floodplains,” wetlands delineations satisfying Section 404 of the Clean Water Act were not conducted in the HGS project areas during field activities. Moreover, elsewhere in the DEIS it is stated that there would be direct loss of wetlands, and that these impacts would be “adverse and somewhat significant.” In addition, a formal wetland mitigation plan has not been developed. We are concerned that avoidable and/or unmitigated impacts may occur to wetlands, and recommend that wetlands be delineated throughout the project area and that a detailed Wetland Mitigation Plan be prepared and implemented to assure that adequate replacement of lost wetland functions and values occurs. C36*

How would SME mitigate the loss and degradation of floodplain and wetland areas? C80

Response: These are non-jurisdictional wetlands and do not require delineation according to Section 404. These sites are small depressions in the cropland that hold water a bit longer than surrounding land.

The quoted statement in Section 4.4.4 for the Salem site has been changed to read as follows: “There would be minimal loss of non-jurisdictional wetlands ~~and floodplains~~ from these actions, and ...” A similar statement for the Industrial Park site has been modified to read: “The notable exceptions are the impacts associated with the installation of the longer water intake pipeline, which could potentially affect a greater area of non-jurisdictional wetlands ~~and/or floodplain~~, and the ...”

The quoted statement from Water Resources in Section 4.17 has been modified to read: “Direct loss of wetlands and floodplains adjacent to the Missouri River would result from the construction and operation of the water intake structure in the Morony Reservoir and the installation of transmission line and pipeline within the River corridor. These impacts would be temporary, adverse and ~~somewhat insignificant~~.”

During site construction, these soils can be salvaged and new depressions would be immediately constructed outside the plant and the railroad loop. Since SME plans to plant all disturbed areas with native species, these areas would also be planted to native species. Approximately five sites, totaling 4.6 acres of these non-

jurisdictional wetlands, are located within the proposed plant site. A landscape architect under contract to SME is currently in the process of developing a site landscaping plan to meet county requirements and address visual effects.

11. *The DEIS indicates that the HGS will require a Clean Water Act 404 permit from the U.S. Army Corps of Engineers, and a Clean Water Act Section 401 authorization from the MDEQ. When a 404 permit is required for a proposed project, EPA generally recommends that a draft 404(b)(1) analysis for the preferred alternative be appended to the FEIS to better assure that the preferred alternative has been adequately evaluated in accordance with 404 (b)(1) requirements. This will help assure that 404 regulatory requirements are properly integrated into the NEPA process as directed by the CEQ regulations (40 CFR 1500.2(c)). C36*

We also recommend consideration of a single 404 permit to cover the dredge and fill permitting for the project. We feel this is preferred over issuance of a combination of numerous individual and nationwide permits, since it may allow for improved cumulative effects evaluation as well as reduced paperwork and permit processing time, and assure that all necessary permits for dredge and fill activities can be obtained for the full project. Although we realize if the project is to be constructed in several segments over varying time periods it may be appropriate to permit each construction segment individually. C36

Response: SME submitted a joint application to DEQ and the Corps of Engineers as well as Cascade County in March 2006. This application covers all water related permits including the 404 permit. The 404 permit for the HGS would cover the water intake structure in Morony Reservoir. The pipeline would not be installed in the drainage going down into the reservoir but rather along an existing road along a ridge and slope. No wetlands, riparian vegetation, or soils at the water's edge would be disturbed, because the pipe into the river would be installed underground.

12. *The EIS should evaluate potential project effects on any function and water quality impacts to potential drinking water aquifers. EPA suggests ensuring that plans for any development areas with the potential to impact any potential drinking water sources are coordinated with the MDEQ and be evaluated for compatibility with Montana Source Water Protection plans. The SME should contact the MDEQ Source Water Protection Program staff, which has developed and maintains a database of source water protection areas to identify areas within or downstream of the project area (contact Joe Meek with MDEQ in Helena at 406-444-4806). Typical databases may contain GIS and Access information for the watersheds and aquifer recharge areas, the most sensitive zones within those areas, and the numbers and types of potential contaminant sources identified for each system. C36*

Response: The existing environment is described in Sections 3.2.6 and 3.2.4 for groundwater and surface water respectively. Impacts to groundwater and surface water are addressed in Section 4.4, Water Resources and 4.13, Waste Management. See the response to WAT-500-5 above for more information. There are no

anticipated impacts to the aquifers underlying the HGS and, therefore, no impacts to drinking water wells developed in that aquifer.

13. *The DEIS states (page 4-18) that during site preparation and grading activities, soils in the construction areas may become exposed, rutted, and compacted, which has the potential to increase water yields from sites, concentrate and channelize sheet flow, increase erosion rates, and increase sediment delivery to nearby waterbodies. This could result in transport of small quantities of sediment and nutrient loadings to the Missouri River or its tributaries, which as already noted, are currently impaired by excess silt and nutrient concentrations.*

We note that the latest schedule for TMDL development in Montana indicates that Belt Creek and the affected portion of the Missouri River are within the Missouri-Cascade TMDL Planning area, with TMDLs due from 2009 to 2012, <http://deq.mt.gov/wqinfo/TMDL/TMDLSchedule2006.pdf>.

The EIS should describe how the proposed project might affect the impaired streams, particularly how the water quality parameters causing the impairment and 303(d) listing may be affected. It is important that the proposed project avoid aggravating water quality impairment and be consistent with TMDLs and Water Quality Restoration Plans being prepared by the State and local watershed groups. Proposed HGS construction and operation activities should be discussed with MDEQ and any local watershed groups that are involved in preparing TMDLs and watershed restoration plans for the impaired streams. C36

Response: The DEQ Water Protection Bureau is required to consider TMDLs when issuing any permits under the MPDES permit process as discussed in the response to comment 1-400. SME is not proposing to discharge treated effluent into the Missouri River, which would require consideration of the TMDL. SME would only be required to control storm water during construction and operation of the HGS. Best management practices (BMPs) would be required to contain all silt and eroded soil on site and prevent its migration to and deposition into the Missouri River and any drainages between the site and the river.

14. *The fact that Great Falls needs to use its water right or lose it is very important to this community. C53*

One of the hurdles that we have faced and continue to work on is what we are going to do about water for the power plant. Well, the City of Great Falls, fortunately, had water reservations. And we were able to work a deal out with them to purchase an option on a water reservation, and then they could turn that into a water right. So that was a mutual benefit for both of us. I should also say that there was concern about the amount of water that we were going to take out of the Missouri, and that is just a falsehood. We're not using that much water. 3100 gallons per minute just doesn't have that much of an impact on the Missouri. C159

Water has become a big issue among the citizens, yet from my investigation of the City of Great Falls' water rights, it turns out to be a non issue. The DEIS substantiates my own research that a present water right reservation if going to be used that will further patent that claim to the water advantage of the citizens of Great Falls. This will not have any effect on our historic water rights. C306

Response: The July 1, 1992 Board of Natural Resources and Conservation's Final Order for the Missouri River Basin establishing water reservations above Fort Peck Dam states that the term of the City of Great Falls Water Reservation is to year 2025.

15. *We decided what we would do with the waste water. The best thing we could come up with to do is to pipe it back to the city treatment center, so we don't have to send any dirty waste water back to the Missouri. C159*

Response: Thank you for your comment.

16. *As a comparison, the proposed Highwood facility would withdraw up to 0.77 gallons per kilowatt-hour (gal/KWh), and it would consume 0.61 gal/KWh. Thus, the proposed facility's water consumption rate would be among the highest of all fossil-fueled power generating plants. (As a sidenote, the proposed Silver Bow Generation Project, a 500-MW natural gas-fired combustion turbine plant, would consume about 0.29 gal/KWh and the proposed Roundup Power Project, a 780-MW pulverized coal-fired power plant, would consume about 0.08 gal/KWh.) Therefore, less water-consuming means of producing energy, even with fossil fuels, are readily available and ought to be prioritized in Montana, where water is not a plentiful resource. C71*

Response: The agencies have to evaluate the proposal as submitted by the applicant. Alternatives can be reviewed as well, but if the proposal can meet all applicable standards and the resources needed for the proposal are available, then the agencies do not have the authority to mandate alternative technologies. The agencies could mandate alternative pollution control devices needed to achieve applicable standards and permit limits.

17. *The draft EIS for the proposed Highwood Generating Project is woefully inadequate in its treatment of water-resource issues. The project could seriously threaten water quality and unnecessarily exacerbate conflicts over water quantity. C71*

Response: The DEQ licensing and permitting processes are designed to protect water quality and the City of Great Falls has valid water rights.

18. *Since Fort Peck and the Corps of Engineers have filed water rights claims, what consideration has been given for 'downstream' states like Missouri and Kansas who might petition the federal government to not allow any federal funding to any project on the Missouri River that might reduce downstream flow, vital to their own states recreation, commerce, barge traffic and irrigation? C80*

Response: The amount of water proposed to be used at SME's power generation facility is miniscule in comparison to the flow of water in the Missouri River at Missouri or Kansas. No consideration has been given to impacts to these downstream states in this proceeding. It would be purely speculative to guess how downstream states may react to a funding issue, and RUS funding decisions may not be based on speculative actions.

19. *What actual contracts [for the exchange of water rights] have been signed by SME with the City of Great Falls and where is the actual contract for the public to examine? C80*

Response: The state is not aware of the contractual arrangements between the City of Great Falls and SME. The City of Great Falls has filed an application to add a point of diversion and place of use to its municipal water reservation to accommodate SME's proposed power generation facility.

20. *The high sodium content in Decker and Spring Creek coal causes deposits in the generating plant that have to be removed by blasting. The fluidized bed process will be impacted by the high sodium content of the coal. The high sodium content in the coal is what made the ash problem more serious at Colstrip. Sodium is highly water soluble and rain will percolate through the ash pit and cause the sodium to migrate. The high sodium in the coal will also add more sodium to the water treatment facility. Can the city water treatment facility handle the additional sodium load from this water? What will the sodium level of the discharge water be? The Tongue and Powder Rivers and Rosebud Creek currently have salinity and sodium standards set. The Missouri will not be protected from sodium and salinity without these standards. C104*

Response: The industrial waste water that would be sent to the city's waste water treatment plant is water that would be left over from the cooling process. It would not come in contact with the coal or the fly ash. Therefore, the sodium content in the coal or the fly ash is not an issue with regards to the waste water treatment plant. Any sodium left in the fly ash would remain in it in the ash monofill. The ash would be handled dry, rather than wet as is the case at Colstrip. This would minimize any impacts to groundwater. See 5-500 above for more information regarding infiltration into groundwater. In addition, sodium preferentially bonds to clay particles and the depth of the clay till under the proposed plant is at least 60 feet based on soil borings and is more likely nearly 110 feet based on information from the nearest wells. The sodium would be partially responsible for how the ash sets up a crust when it gets wet, preventing wind erosion of the material.

21. *Page 4-20, fifth paragraph, sixth line. Revise the size of the potable water pipeline from "...12" ductile iron or HDPE..." to "...6" ductile iron or HDPE...". C128*

Response: This change has been made as requested.

22. *Page 4-25, fourth paragraph, first sentence. This sentence states "if the industrial park site were to be chosen as the location of the power plant, it would almost certainly be*

annexed into the city...” Comment: It has not yet been decided whether either site would be annexed into the City. C128

Response: This sentence has been modified to read as follows: “if the industrial park site were to be chosen as the location of the power plant, it ~~would almost certainly~~ could be annexed into the city...”

23. *Page 4-27 states, “The power plant would discharge a maximum of 811 gal/minute of wastewater. The operation of the power plant would result in impacts that would be of moderate magnitude, long term duration, and medium extent, and have a probable likelihood of occurring. The overall rating for impacts on water resources from the operation phase of the power plant would be adverse, and while impacts would likely be non-significant, there is a potential for them to become significant.” There are two problems with this statement. First, the magnitude of impacts to water resources is not substantiated in the text. For instance, there is no quantitative prediction of water impacts. What is the basis of the conclusions for impacts? Secondly, as mentioned in earlier comments, what does it mean that there is potential for impacts to become significant? This statement requires substantiation if it is going to be used. C128*

Response: A review of the water resources analysis shows that the impacts do not meet the criteria for moderate magnitude as defined in Appendix J. Therefore these statements have been rewritten as follows: “The power plant would discharge a maximum of 811 gal/minute of wastewater. The operation of the power plant would result in impacts that would be of moderate minor magnitude, long term duration, and medium extent, and have a probable likelihood of occurring. The overall rating for impacts on water resources from the operation phase of the power plant would be adverse and ~~while impacts would likely be non-significant, there is a potential for them to become significant.~~”

24. *Page 4-132, Water Resources Section, last sentence. “The subsequent discharge of wastewater into the City of Great Falls for treatment at its existing wastewater treatment facility would result in adverse and moderate in magnitude impacts.” What is the basis of the conclusions for impacts? There is no quantitative prediction of water impacts presented and the qualitative discussion on page 4-23 suggests that discharges would be within allowable limits as stated, “Among several compounds, trace amounts of the heavy metals arsenic, copper, zinc are expected to be present in the wastewater discharged from the plant. There is a possibility that extremely low concentrations of lead and mercury may also be present in the discharged wastewater. However, the concentration of all regulated compounds in the power plant waste stream would be below the maximum allowable discharge concentrations.” C128*

Response: The water resources analysis has been reviewed and this statement has been revised accordingly: “The subsequent discharge of wastewater into the City of Great Falls for treatment at its existing wastewater treatment facility would result in adverse and ~~moderate in magnitude~~ but insignificant impacts.”

AIR-600 AIR QUALITY

1. *Paramount among concerns about the project is its impact on air quality, not only locally, but on global conditions. C1, C335*

I want to make a simple analogy, and that is comparing modern coal-fired plants to modern cars. We have tighter environmental rules on our cars every year. Coal-fired power plants have the same tighter rules. Every year they get tighter. C44

A review of the draft EIS reveals that the proposed project will meet or exceed all federal and state SO₂, NO_x, mercury, PM₁₀, and other applicable environmental regulations. C93

I live on the Northern Cheyenne Indian Reservation in Class 1 air. It's not any better or any worse than the air here. We have monitoring stations that are provided by the Colstrip power plants that keep track of our Class 1 air. My health has not been adversely affected nor has my neighbors. Further I worked for the Colstrip power plants. And while their technology was wonderful for the time, the power plants that are being proposed by SME are -- they're being built to the best possible technology that we have available to us right now. It's possible to build power plants, monitor and control emissions and live in a healthy environment. C141

I am concerned about the high level of air pollutants, including heavy metals and greenhouse gases, that the proposed Highwood Generating Plant will be permitted to release into the air I have to breathe. C145

There's one thing I would like to ask, as I have heard all of the derogatory comments about the use of coal, and the reason why I ask that is this: I grew up in a coal heated house, I grew up in a coal heated school, down in the panhandle of Nebraska along with a lot of neighbors that did likewise. And we never suffered any from that exposure. Now, don't tell me there wasn't fumes coming out of those stoves into the house, because anybody that has lived in that type of situation knows that it did happen. And so I feel that a lot of these charges that we've heard this afternoon against an organization that I have learned has treated me very, very honestly -- I don't think they're trying to build something that is going to kill people. C156

Blaine County Farmers Union is totally opposed to the proposed coal-fired power plant because of the emissions of neurotoxic mercury, sulfur and nitrogen oxides and particulates that cause respiratory and cardiac illness and carbon dioxide that contributes to global warming. We are shocked that Coops are promoting such a destructive venture. C162

Carbon dioxide, nitrous oxide and mercury emissions at any level strike terror to my heart. Energy from coal is our past. C175

We are concerned with the technology that is scheduled to be used in this plant because it

allows an unacceptable level of mercury and carbon dioxide to escape into the air, and ultimately in to the Missouri River. This will affect not only our air quality, but also our local food chain. C179

Please consider the Governor's position on coal and the pollution generated by the burning of it. Specifically consider how CO₂ sequestering can be accomplished in MT and especially in the "Highwood Great Falls and East" area As we on the West side of the divide must be conscious of the coal-fired plants popping up in China, so must those downwind of Great Falls be concerned about down wind effects of coal burning. C247

Montana, and especially Great Falls is noted for its clean air quality. To allow a coal fired generating plant in Great Falls, in our opinion, would compromise this air quality and impose a real health risk. C273

I have grave concerns about the proposed HGS and the draft EIS. Basically, I live with my family and friends "downwind" of this project; actually, it is just over the mountains. The wind does blow here almost every day from all directions, but mostly from the Great Falls or "westerly" direction. As a result of the wind, I am extremely concerned about the emissions of Carbon Monoxide, Sulfur Dioxide, Sulfuric Acid Mist as well as Mercury, to name just a few. I, as a citizen of this great state, do not want to be downwind of these emissions! C305

In my judgment, it is utterly irresponsible in the current situation to have proposed, let alone for agencies of state and federal governments to approve an air-quality permit and funding for, an electricity-generating plant whose conception expresses such a short-sighted and narrow view of our responsibilities as human beings....The proposed plant will generate far too much pollution of a sort that has significant environmental consequences. C319

Response: The DEQ's Supplemental preliminary determination (PD) on MAQP #3423-00 regulates air pollutant emissions from the proposed project within the authority provided under the applicable Montana and federal requirements of law. Permit requirements regulating air pollutant emissions are based on a thorough analysis of potential project impacts to air quality resources and are protective of the Montana and National Ambient Air Quality Standards (MAAQS/NAAQS), New Source Review Prevention of Significant Deterioration (PSD) increments, and all other applicable regulatory standards and requirements.

2. *"Cap-and-trade" exceptions are not appropriate for a new plant, nor are exceptions which tolerate periodic excess emissions at any time throughout the life of the plant. C8*

Response: The appropriateness of applicable emissions "Cap and Trade" programs including the Acid Rain Program under Title IV of the Federal Clean Air Act, 40 Code of Federal Regulations (CFR), Part 72, and the Montana state Mercury rule(s) adopted by the Board of Environmental Review (BER) on October 27, 2006, is outside of the scope of this EIS.

Further, the DEQ's Supplemental PD on MAQP #3423-00 does not allow for emissions in excess of the applicable permit limits and conditions. Attachment 2 to Supplemental PD #3423-00 provides an excess emissions report to be used by SME-HGS to report any such non-compliant excess emissions.

3. *Lately, DEQ as not enforced required CAA regulations "to achieve and maintain levels of air quality that will protect human health and safety and, to the greatest degree practicable, prevent injury to plant and animal life and property." It is time that the DEQ be called to task on this. For example, the Draft Air Quality Permit issued by DEQ for this plant overlooks the fact that by emitting approximately one ton of particulates daily this plant will compromise human health and safety! C8*

The proposed plant would produce mercury, carbon dioxide and other toxins that are hazardous to the health of people and animals living in and down wind from Great Falls, not only within the body of the women who are childbearing age who risk having babies with birth defects, but also in the lungs of those who have respiratory problems. It would adversely affect those of us who consider ourselves relatively healthy as well. These toxins would pollute the air we breathe, the water we use, and the soil we use for food production. Any added pollution to our already polluted environment is unacceptable if better alternatives are available, and they are. C24

The air quality of this Great Falls area is good, and it is one of our great, great assets. According to the DEIS, the fallout from the proposed plant will definitely affect the air quality. There's no question about it. To me it is a great disservice to this community that the plans for this plant have progressed even to this point. I sit here and wonder how in the world this could have happened. You talk about acid. You talk about haze, et cetera, in Glacier Park and Yellowstone Park. The fact of the matter is that the HGS will affect our air quality. C27

SME has steadfastly maintained that this method of coal burning is "clean." In reality this is a myth for it produces in one year 1,177 tons of Carbon Monoxide, 944 tons of Nitrogen Oxides, 443 tons of Sulfur Dioxide, 366 tons of Particulate Matter, 62, tons of Sulfuric Acid Mist, 38 tons of Volatile Organic Compounds, 24 tons of Hydrochloric Acid Gas, and 40 pounds of Mercury. C29, C146, C155, C165, C167

In today's scenario Great Falls will reap the benefits, perhaps some local jobs. And the neighboring areas will wreak the havoc of this new construction. The plant will have a nice tall majestic smokestack that will allow several deadly pollutants, including mercury, to travel the air currents and affect us all for miles in every direction. I recall walking the morning of May 19th, 1980, to go to work and finding everything in Havre covered with a fine, gray ash. Yes, this was the day after Mount St. Helens erupted, some 880 miles from here. So if you think the pollutants of Great Falls won't reach the Hi-Line, think again. C38

That's one thing I love about Great Falls--our clean air! Please don't ruin it. C87, C230

Response: The primary objective of Montana's air regulatory program is to "achieve and maintain levels of air quality that will protect human health and safety and, to the greatest degree practicable, prevent injury to plant and animal life and property". This is accomplished through protection of the NAAQS and MAAQS for pollutants considered harmful to public health and the environment including the Criteria Pollutants carbon monoxide (CO), oxides of nitrogen (NO_x), ozone (volatile organic compounds (VOCs) are regulated as a precursor to ozone formation), lead (Pb), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM₁₀), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}), sulfur dioxide (SO₂) as well as hydrogen sulfide and through visibility impact standards. The Clean Air Act, which was last amended in 1990, requires EPA to set NAAQS for wide-spread pollutants from numerous and diverse sources considered harmful to public health and the environment. The Clean Air Act established two types of NAAQS, primary and secondary standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings. The MAAQS are at least as stringent, or more stringent than, the NAAQS. Through the application process for the Supplemental PD on MAQP #3423-00, SME-HGS has demonstrated compliance with the applicable NAAQS/MAAQs, as required for permit issuance.

Mercury (Hg), hydrochloric acid (HCl), sulfuric acid mist (H₂SO₄), and carbon dioxide (CO₂) are pollutants for which no current ambient air quality standard exists. Further, the Montana and Federal Clean Air Acts do not currently regulate greenhouse gas emissions, including CO₂ emissions, from regulated sources of air pollution. Therefore, the DEQ does not have the authority to regulate these emissions under ambient standards in the MAQP #3423-00 for the proposed SME-HGS project. In accordance with the provisions contained in the Administrative Rules of Montana (ARM) 17.8.752, Emission Control Requirements, the DEQ does have regulatory authority for Hg, HCl, and H₂SO₄ emissions for the proposed project. SME-HGS would be required by permit to control Hg, HCl, and H₂SO₄ emissions from the boiler through the use of BACT. The applicable Hg, HCl, and H₂SO₄ emission controls and limits were established through the BACT analysis and determination process. SME-HGS would be required to control Hg, HCl, and H₂SO₄ emissions from the boiler through the operation of an Integrated Emission Control System (IECS) which includes CFB limestone injection technology, a fabric filter baghouse (FFB), a hydrated ash re-injection (HAR) system, and selective non-catalytic reduction (SNCR). Further, SME-HGS would be required to install and operate Hg specific activated carbon injection (ACI) control technology, or an equivalent technology, if necessary, to achieve the BACT determined Hg emission limits contained in the DEQ's Supplemental PD on MAQP #3423-00.

A MAQP issued by the DEQ provides the owner and operator of an affected source of air pollution with a license to emit regulated levels of air pollutants. The purpose and intent of current Montana and Federal law regulating industrial sources of air

pollution is to allow for business and economic development while maintaining a clean and healthful environment through appropriate regulation of the affected source. Through the permitting process for MAQP #3423-00, SME-HGS has demonstrated compliance with all applicable requirements of law, as required for permit issuance.

4. *When you're burning 1.1 billion tons of coal per year, there's going to be an adverse impact on that. I'm down wind. I'm only 90 miles northeast of here. I'm concerned about the toxic contaminants and pollution that will be coming through Rocky Boy. C18, C26*

We can see the fumes from the Colstrip power plant. It's just steam. And that's a 20-year-old plant. They told us we're all going to die from all that stuff. We've got four kids, ten grandkids, four great-grandkids. As far as I know, none of them have had any problems. I have heard of no air problems in all that down wind area. All these worries about all this junk it's ridiculous. C57

I have a very serious concern about the plant that is being proposed because of where I live. We're going to be down wind. And according to some of the studies that have been done, the prevailing winds, particularly the Chinook winds we get in the wintertime, come directly from Great Falls. And approximately 42 to 49 percent of the particulates or the emissions from this plant are going to be in a quarter, which includes my farm and those of my neighbors. So I'm concerned about that. C110

Response: Computer modeling conducted as part of the MAQP application process has demonstrated that all potential downwind impacts from the proposed project are in compliance with the applicable requirements of law including, but not limited to, compliance with the health-based NAAQS/MAAQS.

5. *Management policies of the NPS seek to perpetuate the best possible air quality in NPS-managed areas to 1) preserve natural resources and systems, 2) preserve cultural resources, and 3) sustain visitor enjoyment, human health and scenic vistas. In cases of doubt as to the impacts of existing or potential air pollution on park resources, the NPS errs on the side of protecting air quality and related values for future generations. The DEIS did not include in its analysis the potential air quality impacts of the Salem location on the Upper Missouri River Breaks National Monument and Upper Missouri National Scenic Riverway, which commences approximately 30 miles downwind from the site. Such areas considered are Class II watersheds under the Clean Air Act and given the same consideration of air quality impacts as NPS parklands. C28*

Response: In the DEIS, DEQ and RUS evaluated potential impacts to air quality related values at Class I areas, such as Glacier National Park and the UL Bend Wilderness Area. The Upper Missouri River Breaks National Monument and Upper Missouri National Scenic Riverway are Class II areas, for which air quality related values analysis is not required.

6. *We should want to avoid the problems that countries such as China has. Their air problems are major and mostly due to coal. Just ask anyone who has been a recent tourist to that country. C33*

Response: Thank you for your comment.

7. *The draft air quality permit for the facility is included as appendix I of the DEIS. On page 4-38 and elsewhere in the DEIS are references to specific information in "the PSD Application." The citations listed in chapter 6 include, instead of the permit application, the Montana Air Quality Permit (Draft) – Permit #3423-00, with a link to the Internet. The document cited, and the document at the Internet link, are the same as the draft permit included as appendix I. In order to make the permit application serve NEPA purposes, please either excerpt from it the specific information mentioned in the DEIS or accurately incorporate it by reference and make it available to the public. C36*

Response: The application for MAQP #3423-00 is on file with the Department and is available to the public upon request.

8. *In an article in the Havre newspaper, Mr. Chaffee says 99.5 percent of the particulates will be captured before going into the air. He used graphs to show the amount of particulates reaching Havre and Fort Benton. He said this will be close to zero, close to zero. Now, in the next column Mr. Gregori estimated that the plant will receive about 220 pounds of mercury, and 22 pounds of this will be released into the atmosphere. C47*

Response: The BACT-determined fabric filter baghouse control requirement for particulate emissions from SME-HGS CFB boiler operations has a control efficiency estimated at approximately 99.85%. Therefore, 99.85% of the potential particulate emissions would be captured which equates to potential emissions after control of 138.03 tons per year (filterable particulate matter). Further, computer modeling conducted as part of the MAQP process has demonstrated that all potential downwind impacts, including impacts to air resources in and around Havre and Fort Benton, are in compliance with the applicable requirements of law.

Regarding mercury emissions, which are not currently regulated by any NAAQS or MAAQS, the DEQ's permit analysis estimates that approximately 40 pounds per year of mercury would be emitted to the atmosphere through proposed CFB boiler coal combustion. (After implementation of the Montana mercury rule, this would be reduced to approximately 22 pounds annually.) Mercury emissions from coal combustion vary in form. A portion of the mercury emitted would be emitted in particulate form and thus would be effectively controlled by the fabric filter baghouse, while mercury emitted in non-particulate form would pass through the fabric filter baghouse and would be captured only with mercury-specific controls. Therefore, the particulate control efficiency of a fabric filter baghouse is not directly representative of the control device's mercury control efficiency.

9. *The fact that you're going to have constant systems emission monitoring I think makes a*

big difference here. That way you will be kept abreast of what is going on and be as safe as possible. C53

Response: The Supplemental PD on #3423-00 requires continuous emission monitoring systems (CEMS) for opacity, NO_x, and SO_x. The CEMS provide ongoing compliance assurance for applicable emission limits.

10. *Granting an air quality permit before an EIS has been completed and the public given the opportunity to comment thereon makes a mockery of the EIS process and points up that recent changes in regulatory authority and MEPA will not insure a "clean and healthful" environment as required by the Montana Constitution. The DEQ cannot make substantive determinations and the procedural ones being made are not adequate to the task of protecting our "clean and healthful" environment here in Great Falls. A recent letter from the Governor's office to me to which a comment from the DEQ was attached and a recent article in the Great Falls Tribune make it clear that as far as the DEQ is concerned the matter has been decided and the only purpose of the EIS is only to determine what mitigation measures are required. C78*

MEIC notes its objection to the DEQ's preparation of a draft permit prior to the completion of the EIS process. The purpose of an EIS is to assess impacts and alternatives prior to taking action to permit a facility. C95, C134

Response: In accordance with the provisions contained in ARM 17.8.760 and the Montana Code Annotated (MCA) 75-2-211, when an application for a proposed project requires an EIS under the provisions of the MEPA, the procedures for public review are those required by MEPA. Further, because the federal lead agency on the EIS is the RUS, the DEQ cannot issue its final decision on the air quality permit until after the 30-day comment period on the final EIS. Therefore, the DEQ will not issue a final decision on MAQP #3423-00 for SME-HGS until all requirements of NEPA and MEPA are satisfied.

11. *Applicant has referenced a plant with similar technology in Indiana or Kentucky. In talking with engineers who have studied this sister plant in operation, I have learned that it has been very difficult for the plant to maintain permitted levels of the various discharges because chemical additives need constant adjustments for factors which change constantly. It would seem that this type of plant would be impossible to monitor adequately to insure that standards you set are being achieved. Has DEQ talked with regulators and plant officials for this sister plant to determine problems they have had in meeting their permit in actual operation? C78*

Response: SME-HGS pre-application discussion and correspondence between DEQ staff and Commonwealth of Kentucky – Department of Environmental Protection staff has indicated that the permitted and operational East Kentucky Power Cooperative, Inc., Spurlock Station, Gilbert Unit 3 (sister plant to the proposed SME-HGS plant), has in fact been able to demonstrate compliance with the applicable permit terms. The DEQ's Supplemental PD on MAQP #3423-00 includes

various compliance monitoring provisions ensuring adequate monitoring of applicable permit terms and emission limits. Further, the proposed project is subject to the requirements of the Title V operating permit program. The Title V operating permit for SME-HGS, when issued, would incorporate additional compliance demonstrations, recordkeeping requirements, and reporting requirements to monitor compliance.

- 12. I am concerned that if standards DEQ sets in its air quality permit are not met, the company, once the plant is built, will request modifications to the permit to allow even greater pollution. In my opinion, at the very outset applicants should not be allowed to submit proposals, which they know, are risky or even impractical with the idea that they will get modifications in the permit later. Granting an air quality permit to such folks with such foreseeable problems will only allow capital to be wasted if the plant can not be operated adequately. C78*

Response: In accordance with the provisions contained in ARM 17.8.748 and ARM 17.8.818, a regulated source is allowed to modify an existing MAQP for cause. For any substantive permit changes, the applicant for a modified MAQP must demonstrate compliance with all the applicable requirements of law as required for modified permit issuance.

- 13. The permit should expire after eighteen months if construction has not commenced. This was a condition in the Roundup permit and should be here also, especially since technology is advancing so rapidly in this field. C78*

Response: DEQ's authority for requiring that construction commence within a particular timeframe is found in ARM 17.8.762(2). That rule subsection states that: "A permit issued prior to construction or installation of a new or modified facility or emitting unit may provide that the permit or a portion of the permit will expire unless construction or installation is commenced within the time specified in the permit, which may not be less than one year or more than three years after the permit is issued." The rule does not require DEQ to include a deadline for commencement of construction, but provides DEQ with the discretion to include a deadline of from one to three years. In Section III.H of MAQP #3423-00, DEQ has included a permit condition stating that the permit will expire if construction does not begin within three years after permit issuance.

EPA's Prevention of Significant Deterioration (PSD) regulations, at 40 CFR 52.21(r)(2), provide that the appropriate timeframe for commencement of construction of a facility subject to PSD review should be limited to 18 months. Further, 40 CFR 52.21(r)(2) includes a provision allowing EPA to extend the 18-month time period upon a satisfactory showing that an extension is justified. Based on DEQ experience, it is very difficult to commence construction of a major power plant within 18 months after issuance of the air quality permit. As previously referenced, ARM 17.8.762(2) provides DEQ with discretion to determine, on a case-by-case basis the appropriate timeframe, if any, for commencement of construction

of a permitted facility. DEQ determined in the present case that a three-year period for commencement of construction of the SME-HGS project is justified. Including a deadline for commencement of construction is intended to ensure that the pollutant-specific BACT determinations for the permit are current at the time of commencement of construction.

14. *MEIC has grave concerns over the proposed Highwood Generating Station. Coal remains the dirtiest way to generate a kilowatt-hour of electricity, across a wide range of atmospheric pollutants, and this certainly holds true for the proposed plant. C95, C134*

If the builders would decide to build the coal burning plant that would eliminate the mercury and other heavy metals along with reducing the CO2 emissions into the air, then I would support the plant building. But they feel it would cost too much to provide clean air...well, I want to breath 'clean air' in my town of Havre, MT. It's funny that they are not willing to build this plant in their back yard, they are the ones benefiting from the generation of the electricity. C100

Response: SME-HGS proposed a coal-fired power plant incorporating a CFB Boiler for the production of steam to be routed to a steam turbine, which in turn drives an electric generator capable of producing electrical power. The EPA NSR Manual, which provides guidance on the BACT analysis and determination process for major sources of air pollution, states that, "historically, EPA has not considered the BACT requirement a means to re-define the design of the source when considering available control technologies." Based on Department analysis of the proposed project, the Department determined that redefining the source from a CFB project to an alternate electrical generation technology is not appropriate, in this case.

Furthermore, it should be emphasized that, 1) carbon dioxide is not a regulated pollutant, and 2) the HGS would meet all applicable regulations and other requirements.

15. *Page 4-28, Section 4.5.1. and Page 4-57, Conclusion. The description of adverse air impacts from the no action alternative needs to be changed to reflect the potential for significantly higher emissions. It is currently anticipated that SME will lose most of its power supply by 2011, which consists of hydropower, and there is no expectation that this hydropower source will be restored. It is probable under a no action alternative that SME's projected electricity load will be met through purchases of power primarily from other coal-fired plants in the state or region. These plants are primarily older generation facilities, with less air pollution control than HGS, and emissions of most pollutants are likely to be higher than that expected from the HGS. C128*

Response: There is no way of determining at this point what the power source would be for electricity that would be purchased under the No Action Alternative. It could come from an older, dirtier coal-fired plant, from a newer, cleaner coal-fired plant, and/or from a wind farm or other renewable source. Therefore, the

range of environmental effects attributable to the generation source(s) could vary substantially.

16. Page 4-31, first paragraph, third sentence. Strike this sentence about the preliminary determination for the preconstruction permit since this paragraph deals with the operating permit to be addressed prior to operation of HGS. C128

Response: This change has been made in the FEIS.

17. Page 4-33, first paragraph, third line. At this time the fabric filter bag material is unknown. Please remove the word fiberglass. C128

Response: This change has been made in the FEIS.

18. Page 4-33, second paragraph, fourth line from the end of the paragraph. Add language to the existing line which states "...Hydrated ash reinjection is a type of dry flue gas desulfurization (FGD) system that allows for additional conversion of SO₂ to CaSO₄...." While each CFB boiler supplier has different equipment and system descriptions, each system will accomplish the same result which is the removal of SO₂ emissions. *Italics added for emphasis. In Table 4.2 and throughout the document we suggest that hydrated ash reinjection be changed to secondary flue gas desulfurization as a more general term covering multiple sulfur control systems.* C128

Response: The DEQ will consider this request under the final decision on MAQP #3423-00. Because the current PD #3423-00 specifies Hydrated Ash Re-Injection (HAR) technology, the EIS should maintain this SO₂ control terminology.

19. Page 4-35, fifth non-bulleted paragraph, second line. Change the existing word boiler to heater as noted "...Therefore, these heaters would be considered..." *Italics added for emphasis. The heaters do not boil water or make steam but do heat the ambient air.* C128

Response: This change has been made in the FEIS.

20. Page 4-57, Mitigation Measures. This section should mention use of Continuous Emission Monitors (CEMs) and a computerized control room to minimize the "potential to become significant" claim in the Conclusion Section. CEMs and a computerized control room will adjust equipment and pollution control parameters to maintain compliance or will set off alarms when an emissions limit is being approached. C128

Response: This change has been made in the FEIS.

21. The DEIS is weak in a number of areas. For example, the DEIS allows a number of initial months for non-compliance. **This is totally unacceptable.** The most stringent pollution controls need to be installed immediately, not added later to meet minimum requirements, as is currently planned. C8

Response: Please see ARMB response to comments at AIR-602-1.

22. *Being a person who lives directly east of the proposed power plant, which is down-wind, I feel there will be no problems. Plus, the small amount of CO2 emitted will benefit our crops. C41*

I live in Winifred, Montana, east of the proposed plant as well as down-wind, and I have no reservations whatsoever that this facility would be an environmentally safe venture. C296

Response: Thank you for your comments.

AIR-601 AIR QUALITY – CRITERIA POLLUTANTS

1. *Southern Montana Electric understands that some folks are concerned about downwind impacts from the proposed power station and that they would be significantly impacted by the emissions from the Highwood station. As part of the air quality permit application, a series of air dispersion models were run to project impacts of emissions. These models used are widely used by the EPA and the State DEQ to measure impacts of projects like this coal-fired power plant. At the request of SME, Bison Engineering put a line of receptors in the dispersion models reaching from the power station downwind to both Fort Benton and Havre. This direction is in line with the prevailing wind direction from the Great Falls area out of the southwest. Havre, at a distance of over 90 miles from the proposed power plant site, wouldn't normally be studied in these dispersion models, in a study like this, because it's so far away. Model runs were run for several of the air pollutants that people are concerned about: particulate matter, less than 10 microns in diameter, PM-10; nitrogen oxides; and sulfur dioxide. Beyond eight miles in the downward directions, pollutant concentrations drop off quickly, reaching a level of about .03 percent of the standard at Fort Benton, and dropping to near zero all the way out to Havre. These modeling results show what air pollution scientists know, from their studies, that a power station with best available pollutant control technology has very low impacts on the surrounding area. C11*

Page 4-42 - Class II Area NAAQS and MAAQS Analysis - To supplement the oral testimony given by SME at the Havre public hearing on August 7, 2006, SME is submitting the attached graphs. To address public concerns about impacts of pollutants at distances in the prevailing downwind direction from the facility, SME ran the ISC3 model with a line of receptors along a line from the Highwood Generating Station out to Fort Benton and Havre, Montana. The graphs represent modeling concentrations for annual SO₂, PM₁₀, and NO_x impacts along the line of receptors for one year of modeling with a comparison to the ambient standards for each pollutant. As illustrated in the graphs, annual impacts along the line of receptors from these three pollutants are near zero and a very small percentage of the ambient standard. C128

As an asthma sufferer [and Fort Benton resident], I will be in the direct wind path of contaminants emitted by the plant....Although they are proposed to be less than conventional coal-fired plants, any pollutant emitted will worsen the air quality for people downwind. Here in Fort Benton, whatever the wind carries is trapped and settles in the town and makes it bad for people with respiratory problems. C325

Response: Computer modeling conducted as part of the MAQP process has demonstrated that all potential downwind impacts from the proposed project are in compliance with the applicable requirements of law including, but not limited to, compliance with the health-based NAAQS and MAAQS.

2. *As designed, each year, the Highwood Generating station would add thousands of tons of pollution such as carbon monoxide, sulfur dioxide, hydrochloric acid, particulates, mercury and lead into the air in Great Falls. As a public health nurse practitioner I am*

deeply concerned about the potential adverse public health effects from increased heart disease, respiratory problems and developmental effects in children in the surrounding area. C17, C60, C81, C137

A 2006 television HBO documentary, "The Air We Breathe", graphically demonstrates the marked increase in the rates of asthma in children living adjacent to coal plants. The Highwood Generating Station is permitted each day to release one ton of dangerous, respirable PM 10 particulates, laden with toxic heavy metals such as arsenic and lead. We now have evidence that very small particles not only endanger people's lungs, but also hearts and arteries (Science News, August 2, 2003, p.72). C20

The revised draft air quality permit for the Highwood plant shows it will emit 62 tons of Sulfuric Acid Mist per year, 24 tons of Hydrochloric Acid Gas per year, 20 tons of Hydrofluoric Acid Gas per year, 944 tons of Nitrogen Oxides per year, and 443 tons of Sulfur Dioxide per year. These chemicals are all contributors to acid rain. Who will pay for acid rain damage to vehicles, steel-sided building, etc., located within a fifty-mile radius of the power plant or downwind of the plant? C50

I'm really concerned that we're creating a whole new generation of downwinders. This is not a war. There is no acceptable level of casualty. There is no acceptable level of collateral damage. We can do this without harming people's lives. So I find it unconscionable that this method [CF B] was even selected. And I don't want to create another generation of downwinders. C74

Impact of emission spikes of criteria pollutants must be included. We are concerned about the potential of emission spikes of criteria pollutants from the Highwood Generating Station from a public health standpoint. While environmental law is not yet sophisticated enough to accommodate new scientific information quickly, we believe it is important to bring to the DEQ's attention. Specifically, there have been a number of recent scientific studies looking at short term increases in pollutant levels and their effects on health. Serious health effects, such as increases in hospital admissions for stroke and cardiovascular diseases, have been associated with small increases in ambient pollutant levels of PM10, SO2 and NOx - even those increases that last no more than a single day. We have attached at the end of these comments, abstracts from three recent studies which highlight the types of health effects associated with short term increases in ambient pollution associated with the Highwood Generating Station. We ask that the EIS incorporate this information, and further explain the potential impacts of short term spikes of pollution in Great Falls. C154

Air pollution from power plants alone contributes to an estimate 30,000 pre-mature deaths, hundreds of thousands of asthma attacks, and tens of thousands of hospitalizations for respiratory and cardiovascular illness each year. C169

The Northern Cheyenne Indian Reservation is located 240 miles southeast of Great Falls. The prevailing winds are from the west and northwest. The reservation is a redesignated Class I air shed. There will be air quality impacts from this generating station. The

accumulative effects from all sources surrounding the reservation does affect air quality and visibility. C272

The pollution analysis is weak. The accumulation of pollutants over time in Great Falls neighborhoods and in the surrounding farmland is not adequately addressed. There needs to be an analysis of the numbers of people who will suffer pulmonary problems from particulates. C303

During winter months we occasionally get extended periods of strong inversions associated with arctic air and easterly winds. This would funnel the effluents back into Great Falls where it would be trapped under the inversion....In fact, at any time of year, when we experience an easterly or northeasterly wind Great Falls residents would be affected by the effluent. C321

As a pharmacist, I am very concerned by the various emissions, many of which aggravate asthma and other lung conditions. Again, the level of emissions projected may be woefully understated. I would hope that best practices, not outdated standards be the rule in proposing or accepting any power generating system today. Our nation is experiencing an increase in asthma and asthma-related deaths. It is imperative that any proposal not increase these numbers. C331

Response: The primary objective of Montana's air regulatory program is to "achieve and maintain levels of air quality that will protect human health and safety and, to the greatest degree practicable, prevent injury to plant and animal life and property". This is accomplished through protection of the NAAQS and MAAQS for pollutants considered harmful to public health and the environment including the criteria pollutants CO, NO_x, Ozone (VOCs are regulated as a precursor to ozone formation), Pb, PM₁₀, PM_{2.5}, SO₂ as well as hydrogen sulfide and through visibility impact standards. The Clean Air Act, which was last amended in 1990, requires EPA to set NAAQS for wide-spread pollutants from numerous and diverse sources considered harmful to public health and the environment. The Clean Air Act established two types of NAAQS, primary and secondary standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings. The MAAQS are at least as stringent as, or more stringent than, the NAAQS. Through the application process for the Supplemental PD on MAQP #3423-00, SME-HGS has demonstrated compliance with the applicable NAAQS and MAAQS, as required for permit issuance.

For pollutants such as mercury and acid gases, for which no standard currently exists, the DEQ regulates emissions through enforceable control technology requirements and/or emission limits. The applicable conditions/limits are established under authority provided by the BACT program contained in ARM 17.8, Subchapters 7 and 8.

An MAQP issued by the DEQ provides the owner and operator of an affected source of air pollution with a license to emit regulated levels of air pollutants. The purpose and intent of current Montana and Federal law regulating industrial sources of air pollution is to allow for business and economic development while maintaining a clean and healthful environment through appropriate regulation of the affected source. Through the permitting process for MAQP #3423-00, SME-HGS has demonstrated compliance with all applicable requirements of the law, as required for permit issuance.

3. *Acid rain, a by-product of the coal industry, could do damage to surrounding forests. C33, C78*

Will the tourists still come to see Montana's beautiful landscapes when acid rain ravishes them like the emissions from Midwest power plants are currently doing to the New England forests? C50

Response: Emissions associated with acid rain (NO_x and SO₂) are regulated by a federal emissions "Cap and Trade" program under Title IV of the Federal Clean Air Act, 40 Code of Federal Regulations, Part 72. Further, the Supplemental PD on MAQP #3423-00 includes enforceable emission limits and control strategies for these pollutants established in accordance with the requirements of the ARM 17.8.752, Emission Control Requirements. Also, through the application process for the Supplemental PD on MAQP #3423-00, SME-HGS demonstrated compliance with the applicable requirements including the NAAQS and MAAQS, which include secondary standards designed to be protective of public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings.

4. *Table 3-5 (page 3-30) presents data from ambient air monitoring which help to characterize the existing environment. This table could more completely explain the data presented. In the case of a 24-hour PM₁₀ concentration, for example, it would be helpful to know whether the concentration reported is a maximum daily average, a second-maximum, a 99th percentile, or other value. Please explain the data presented in more detail. It would also be helpful to include information on the sources of the data beyond the "county air quality report," for example the locations of the air monitoring stations and the period of record. C36*

Response: The 24-hr maximum PM₁₀ concentration of 23 µg/m³ reported in Table 3-5 of the DEIS is in fact the maximum calendar day average monitored at the station. As provided in the footnote at the bottom of the table, the data were collected at a monitoring station located at the proposed and permitted site of operation.

5. *Page 3-35 refers to the deposition analysis thresholds adopted by the Federal Land Managers to evaluate potential acid deposition. The significance thresholds for deposition of sulfur and nitrogen compounds in Class I areas and acid neutralizing*

capacity in sensitive lakes cannot be found in the DEIS. Please include the significance criteria for deposition and acid neutralizing capacity in the Final EIS. C36

Response: The Federal Land Managers (FLM)-established annual Deposition Analysis Thresholds (DAT) for total nitrogen and total sulfur deposition are each 0.005 kilogram per hectare per year for the western United States. Impacts higher than these levels trigger the requirement for additional analyses. This information has been added to the FEIS.

6. *A paragraph beginning on the bottom of page 4-37 explains the review conducted under the regulations for Prevention of Significant Deterioration (PSD). As discussed in section 3.3.3, Great Falls has been a nonattainment area for carbon monoxide. EPA redesignated the area to attainment in 2002. The FEIS should disclose that Great Falls is now a maintenance area subject to conformity requirements and that these requirements have been addressed through the PSD review (see 40 CFR Part 93.153(d)(1)). C36*

Response: The proposed SME-HGS plant would be located in an area identified as attainment for the applicable NAAQS and MAAQS, including CO. However, the facility would be located near an area that was previously considered a non-attainment area for CO but has recently been re-designated attainment for CO under a limited maintenance plan (LMP). Computer modeling conducted through the MAQP application process for the SME-HGS project demonstrated that the proposed plant would not impact the attainment status of the LMP CO attainment area.

7. *On page 4-43, the sentence introducing table 4-8 is confusing. According to this sentence, “the high modeled concentrations from PSD increment consuming sources (HGS sources and non-HGS sources combined) are 35 percent or less of the respective PSD Increments for all pollutants and averaging periods except 3-hr SO₂ which is less than 75 percent of the PSD increment.” However, the result shown for three-hour SO₂ is also less than 35 percent of the increment. Please revise this section. C36*

Page 4-43, paragraph three, fourth line. This line states the 3-hr SO₂ is 75% of the increment and Table 4.8 shows 2.1%. The 3-hr SO₂ figure of 75% of the increment is incorrect, while the Table 4.8 figure of 2.1% is correct. C128

Response: Commenters are correct. The sentence regarding the SO₂ 3-hour increment has been corrected in the FEIS.

8. *Dust particulates from construction, and ongoing operations on roadways are important concerns. Entities and citizens have often complained of dust problems resulting from these and similar construction activities. The airborne dust may not only be a visual nuisance, but can be potentially dangerous to asthma sufferers. Sedimentation run-off can severely impact the aquatic environment. Please include detailed specific plans for addressing dust control for the project. Items in the plan should include, though not*

necessarily limited to, dust suppression methods, inspection schedules, and documentation and accountability processes. Construction techniques such as 95% base compaction prior to placement of gravel, culverts for water drainage, steep slope construction measures to prevent erosion, and appropriate dust control methods (such as placement of a non-chlorine based dust abatement chemical treatment), are important dust suppression and sediment reduction techniques. C36

Response: In accordance with the provisions contained in ARM 17.8.308, the DEQ's Supplemental PD on MAQP #3423-00 requires that SME-HGS use reasonable precautions to control fugitive dust from haul roads, access roads, parking lots, and the general plant area including, but not limited to, the use of water and/or chemical dust suppressant, as necessary, to maintain compliance with the applicable 20% opacity limit for the affected sources of fugitive dust. Further, these fugitive dust control requirements would be applicable during facility construction activities and constitute BACT for the proposed project in accordance with the provisions contained in ARM 17.8.752. Because these requirements constitute enforceable permit terms, compliance with these requirements would be evaluated through periodic DEQ inspection activities. Also, the pending Title V major source operating permit for the SME-HGS project could include additional monitoring, recordkeeping, and reporting requirements for the affected applicable fugitive dust control requirements.

9. *How will data on acid rain, mercury, lead, volatile organic compounds, etc., be collected in areas outside the power plant property? Who will collect this data in ten-mile, concentric-rings increments around the plant? Will the state oversee this data collection? Will this data be available to the public in a timely manner? C50*

Response: A MAQP issued by the DEQ provides the owner and operator of an affected source of air pollution with a license to emit regulated levels of air pollutants. The purpose and intent of current Montana and Federal law regulating industrial sources of air pollution is to allow for business and economic development while maintaining a clean and healthful environment through appropriate regulation of the affected source. Through the permitting process for MAQP #3423-00, SME-HGS has demonstrated compliance with all applicable requirements of law, as required for permit issuance. The Supplemental PD for MAQP #3423-00 includes conditions and limits that have been shown to be protective of public health and welfare and the environment and comply with the current requirements of law including, but not limited to, BACT and the applicable NAAQS and MAAQS. Because there are no particular concerns regarding compliance with ambient standards, DEQ is not requiring ambient air quality monitoring.

10. *Currently even moderate wind gusts result in Great Falls being coated in dust and dirt. Any coal pile will be another source of particulate. How will SME keep dust from its emergency coal pile(s) from blowing all over the countryside? Will the water allocated for spraying on the coal pile(s) automatically adjust for wind speed/direction? C50*

Response: In accordance with the provisions contained in ARM 17.8.308, Section II.E.8 of the Supplemental PD for MAQP #3423-00 requires that the emergency coal pile be compacted and sprayed with water and/or chemical dust suppressant, as necessary, to maintain compliance with reasonable precautions for fugitive emissions sources and that any fugitive emissions be limited to less than 20% opacity. In accordance with the provisions contained in ARM 17.8.752, these requirements constitute BACT for the affected source of fugitive dust emissions.

11. *Acid rain will have a deleterious effect on wheat farming here in the Golden Triangle. C111*

We don't have the geology to buffer acid rain in this area. We don't have the limestone, the calcium carbonate. So we're going to have an acid buildup. And that's going to affect our plant materials, our forest ecosystem, as well as our wildlife. C129

Response: The proposed SME project is subject to the requirements of the Federal Acid Rain Program under Title IV of the Federal Clean Air Act, 40 CFR, Part 72. Emissions of NO_x and SO₂ (acid rain pre-cursors) would be regulated by this emissions trading program. Further, the primary objective of Montana's air regulatory program is to "achieve and maintain levels of air quality that will protect human health and safety and, to the greatest degree practicable, prevent injury to plant and animal life and property". This is accomplished through protection of the NAAQS and MAAQS for pollutants considered harmful to public health and the environment including the Criteria Pollutants CO, NO_x, Ozone (VOCs are regulated as a precursor to ozone formation), Pb, PM₁₀, PM_{2.5}, SO₂ as well as hydrogen sulfide and through visibility impact standards. The Federal Clean Air Act established two types of NAAQS, primary and secondary. Secondary standards set limits to protect public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings. The MAAQS are at least as stringent as, or more stringent than, the NAAQS. Through the application process for the Supplemental PD on MAQP #3423-00, SME-HGS has demonstrated compliance with the applicable NAAQS and MAAQS, as required for permit issuance.

A MAQP issued by the DEQ provides the owner and operator of an affected source of air pollution with a license to emit regulated levels of air pollutants. The purpose and intent of current Montana and Federal law regulating industrial sources of air pollution is to allow for business and economic development while maintaining a clean and healthful environment through appropriate regulation of the affected source. Through the permitting process for MAQP #3423-00, SME-HGS has demonstrated compliance with all applicable requirements of law, as required for permit issuance.

12. *Page 4-45, third paragraph, first line. A 34 year economic life is generally used for the facility. However, a 40-year life is default for the analysis of trace metals referenced in this section. C128*

Response: Thank you for this additional information.

13. Page 4-45, Summary of Class II Area Impact Analysis. The bullets in this section indicate minor to moderate impacts. SME questions whether these impacts should be considered moderate, when the impacts are very low, the greatest being 35% of the allowable increments. C128

Response: DEQ believes that the designation of impacts as minor to moderate is appropriate.

**AIR-602 AIR QUALITY – HAZARDOUS AIR POLLUTANTS INCLUDING
MERCURY EMISSIONS AND EFFECTS**

1. *I am concerned about mercury. It is an element and does not dissipate naturally, but remains present permanently. Mercury is implicated in a number of adverse health effects, including cancer, asthma, and most likely autism. How can we even consider adding to these problems? C1, C99, C123, C125, C170*

There is no safe level for mercury emissions and there are no guarantees that SME will meet any of the mitigation standards set forth in the EIS. As an attorney, I have first hand experience with self-regulation and find that it is a slow and cumbersome process. Self-regulation is inappropriate if the face of irreversible and immediate harm to people and to the environment. C3

The circulating fluidized bed process (CFB) employed in the Highwood proposal will release large quantities of mercury into the atmosphere unless firm restraints on mercury production are placed in the air quality permit. The majority of Montana rivers and streams are already producing fish that are contaminated with mercury to a dangerous level. It is irresponsible to authorize the construction of any facility that will add to this level of contamination. This is especially important for residents of the nearby Rocky Boy and Fort Belnap Indian Reservations, where fish comprise a greater portion of the diet. C12, C14

Will the R.U.S. ask for a solid number for the amount of mercury to be released? Will the R.U.S. require complete detailing cost of the mercury controls and insist that specific mercury controls must be installed during plant construction? Mr. Tim Gregori in numerous public meetings has indicated that the activated carbon injection process would be installed during plant construction. Why is the R.U.S. going to allow eighteen months of pollution before mercury controls are installed? C14,

I've watched as SME has proposed and agreed to enter more stringent mercury controls as the public discussion on this topic progressed. C19

Despite repeated promises to our City Commissioners and the public that SME will install specific mercury controls (activated carbon injection) the plant as permitted has no specific mercury controls and only a stated intention of possibly adding this control after 18 months of operation "if it's needed". C20

Mercury pollution is a major concern of local citizens. The proposed SME Highwood plant does not have an electrostatic precipitator upstream of the bag-collector or an activated carbon injection stream between the two to improve mercury collection. The following reference, "Results of Activated Carbon Injection for Mercury Control upstream of a COHPAC Fabric Filter" May 2003 [http://www.hamon-researchcottrell.com/industry_Power.asp], describes using this equipment sequence to reduce mercury pollution. Of course, the air pollution control industry has many different ways to reduce air pollution, but a best effort has not been exerted to date. C50

The air quality permit should only allow the best available technology to be permitted. It does not do so. The permit also allows the plant to operate for months before they use the mercury-reducing technology they say they will install. Ostensibly this is to allow them to run their plant and see whether they need it or not! This is unacceptable. Mercury reduction by using best available technology must be required from beginning of plant operations. C78

I am especially concerned about the mercury. As a biological research technician, I can tell you about how careful I must be whenever I break a thermometer (concerns about breathing it), yet here we are thinking it'll be fine to spray it into the air we breath. C87

Two other plants in Montana have agreed to install activated carbon injection, or technology that is equally effective at removing mercury. In doing so, these plants have set the bar for what constitutes best available control technology for mercury. Representatives of SME admitted both before the Board of Environmental Review in July 2006 and in the Great Falls Tribune on November 2, 2005 that stack testing at a similar facility using Powder River Basin coal yielded mercury reductions of as much as 93% and an emission rate of around 0.44 pounds per trillion Btu. Armed with the knowledge of what two other plants in Montana have committed to, and what the developers have said their technology is capable of, DEQ must insist that SME install an activated carbon injection system and operate it at start-up of the facility. In addition, given the information provided by SME on its test burn, the emission limit of 1.5 pounds per trillion Btu is unacceptably lax. C95, C134

Due to uncertainties in emission levels over the course of the year resulting from variations in temperature and coal content, it is reasonable to build some flexibility and leeway into the permit. Establishing an emission limit that is based on a 12-month rolling average provides much of that flexibility and leeway, and is a generous concession. Most other limits are set on a per hour, per day, or per month basis.

Therefore, it is unnecessary to grant further leniency by establishing a standard that is 3.4 times greater than what the test burn shows is possible. An emission limit of 0.8 lbs/Tbtu would be far more appropriate -- approximately double the level achieved in the test burn, it would provide adequate flexibility while still guaranteeing that the plant is operating in a relatively clean manner. C95, C134

It is important to start limiting the amount of mercury that enters Montana's waterways. Coal-fired power plants are the largest contributor to airborne mercury pollution and are the only remaining large source of mercury pollution in need of regulation. C95, C134

A number of studies indicate that mercury contamination not only exacts a high toll on public health, it also impacts the economy. The DEIS failed to consider these economic consequences. Perhaps the most thorough economic analysis of the public health costs from mercury emissions from coal-fired power plants was done by Harvard University and EPA, peer-reviewed by EPA and paid for by EPA. The Harvard Study, published by the Northeast States for Coordinated Air Use Management (NESCAUM), found that

strong mercury controls on coal-fired power plants, similar to the controls originally suggested by EPA, could save nearly \$5 billion annually through reduced neurological and cardiac harm. C95, C134

The reason for having a 12-month averaging time for the emission standard is to account for the variability in the mercury content in the coal. Raising the emission limit to address the same issue is double dipping and will result in an unnecessarily weak standard. C95, C134

Page 4-51, last paragraph, last line. Southern Montana Electric will install an activated carbon injection (ACI) control system as part of the construction of the CFB boiler. The Preliminary Determination does not require the ACI system to be used immediately upon startup of the CFB boiler, in order to allow for testing of the Integrated Emissions Control Strategy (IECS) to control mercury emissions. Because SME will install an ACI system before startup and have it available for use in controlling mercury emissions as needed to meet the mercury emissions limits (or to operate at mercury emission levels below the permit limits), we suggest that installation of an ACI system be listed as a voluntary mitigation measure for mercury emissions (not required by permit unless IECS fails to achieve permit emissions limits). C128

Mercury contamination is a current problem in Montana which the Highwood Generating Station will worsen, not improve. Medical literature is full of studies showing numerous detrimental health effects from prenatal exposure to mercury. There are children, here in Montana, experiencing neurological effects which will impact them for life - because their mothers ate fish contaminated with mercury. For some its only a mild hearing loss, or a few dropped points of IQ, or neurological symptoms of a more serious nature. At any rate, there are children are being born at a disadvantage that will affect them throughout their lives. The Highwood Generating Station will add to the mercury burden in Montana. Reducing local sources of mercury lowers mercury contamination in our rivers and lakes. Adding new local sources of mercury will have the reverse effect. The implications of additional loading of mercury on Montana's rivers and lakes must be fully explained in this EIS. C154

The mercury issue is a real key issue. We're all very concerned about mercury. We spent a good portion of our winter working with Montana DEQ and some of the environmental groups on negotiations on mercury. We don't take this lightly. It's a very serious concern. We know that any amount of mercury has an impact. But we also want to point out that on the National Park Service web site, the Norris and Geyser Basins put out between 205 pounds and 450 pounds of mercury per year. Now, I'm a down winder from the national park, from Yellowstone Park. That's on an average year of 327 pounds. That is 27 pounds higher than the proposed rule from the Board of Environmental Review is for all of the power plants in Montana by 2015. They want all power plants combined to be at 298 pounds. 327 pounds are coming out of the park on an average year. We're still here. I guess I'm just saying let's keep it in relation, let's look at what is naturally occurring, and let's try to hit a happy medium here that we have something to work with. C159

I served as a member of the SME mercury negotiating team this past winter. During the months of December and January, Tim Gregori and myself drove to Helena at least nine times putting approximately 5,000 miles on Tim's car attempting to work out an agreement with the Montana Environmental Information Center and Montana DEQ on the issues related to air quality and mercury emissions. Southern Montana Electric's purpose for negotiating with MEIC and DEQ were to provide some certainty that we could continue with our project in building Highwood station without the constant threat of legal challenges and litigation by MEIC. Also we wanted to resolve the issues related to DEQ permitting by addressing them directly. And I appreciate the efforts of the DEQ. Dave Klemp and Chuck Homer were involved in those negotiations, and we were very appreciative of the efforts that they put forward. And we wanted to come up with reasonable and workable solutions acceptable to both MEIC and DEQ. During these negotiations, SME agreed to accept an air quality permit level of 90 percent mercury emissions control, or 1.5 pounds per trillion BTUs. And I think it's important to note that the leaders of MEIC were pushing for 80 percent control, not 90, in the 2005 legislature. So it seems like when we get talking about some of the control of these items the bar is always escalating higher. In return SME asked that MEIC agree that they would not file any adverse comments or bring any challenge related to our quality permit or mercury emissions position. As it turned out, we could not reach a final agreement on the details of this, and so the agreement was not finalized. I want to reiterate that SME is committed and will remain committed to a well reasoned standard for mercury control. The major environmental protection elements considered in negotiations are included in the draft air quality permit issued by DEQ. We, as members of SME, are taking all reasonable steps toward the protection of the environment in building the HGS. We have been very active with regard to our air quality permit and our mercury emissions control. The environmental community is being somewhat disingenuous when they fail to mention the efforts we have gone to towards this agreement. C159

While the plant might be able to control as much as 90 percent of the mercury, there won't be any requirement to meet that standard and the plant could control as little as 26 percent and still be in compliance. C164

Already 44 states have issued mercury advisories, including Montana. Doesn't it make sense not to put 40 more pounds of it in the air? C165

The plant will emit 36 pounds of mercury annually into the surrounding environment. EOA standards state that 200 micrograms of mercury placed into 23 gallons of water make the water unsafe for human consumption. 200 micrograms of mercury is such a small amount, that it will fit on the head of a pin. C176

Not only does this type of energy hurt the air, its effects can be felt on the land and water. These things then turn into hazards for human beings. There is a lot of toxic discharge, with elements that are poisonous to humans. C193

The mercury that comes from burning coal affects women that are pregnant and their babies. I have 2 aunts presently pregnant and I could not imagine something going wrong with their babies over burning coal. C194

The risks and health effects of mercury contamination continue to be serious and immediate. WE have known about mercury pollution for many years. It remains one of, if not the last of, the major toxic pollutants without a comprehensive plan to control its spread. We know where the sources contributing to mercury contamination are, we have a pretty good idea where it goes, and we definitely know what harm it causes to people and to wildlife. Yet, serious contamination continues. C206

Mercury contributes to birth defects in humans and animals and is linked to other human health problems. Our waters already have increased amounts of mercury from the burning of coal from other power plants in the region. The proposed Highwood Plant will dump some 40 pounds of mercury per year onto the land and into the waters in the downwind shadow of this generating plant. Great Falls is acting as a bad neighbor to Fort Benton, Lewistown, and points east if the Highwood plant is built. The Highwood Plant will definitely hurt the health of Montanans. C248

Mercury pollution is a concern, since it greatly affects the health of pregnant women and young children. The Northern Cheyenne People value their young and elderly population. C272

My husband and I have a grandson who is autistic. There are many studies and most have authenticated the fact that mercury is most likely a contributing factor in autism. We will not stand by to see other children afflicted as he is. It is a parent's nightmare to deal with this condition, and it takes all the money, energy and time that parents have to help such a child lead a decent quality life. C284

I don't comprehend how a permit could be granted considering all of the pollution this plant would pump into our air year after year after year. In 5 years, 200 lbs of mercury I found totally unacceptable from any stand point. Please explain how that is not going to cause harm to humans, wildlife, and plant life. C302

My children have Asperger's autism and believe me, a mother who has been nearly driven to the mental institution, it is a tragedy I wish on no one else. The gene responsible for the enzyme which processes mercury and other heavy metals as well as gluten and casein was found missing in 80% of a sample of autistic persons. Mercury has also been implicated in Multiple Sclerosis, which I have. We try not to eat much fish at all because of the concentration of mercury in fish. Please don't contribute any more to the environmental build-up of mercury and to these dreadful human conditions. C314, C331

I recall several years ago cutting myself and going to the drug store to buy some mercurochrome. Upon asking for it, I was told by the pharmacist that they had to quit selling it because of the high mercury content many years ago. If drug stores, indeed,

can no longer sell such a product, why would we want to have a plant that would produce mercury and several other deadly toxins in the air to eventually pollute our water? C329

The mercury emissions this plant will produce, at an estimated 34.6 lbs. per year, is excessive, not negligible, and will add to an already high mercury burden in Montana and the United States. WE already know that consuming fish caught in Montana may be associated with increased mercury exposure and attendant health risks. C330

Response: In accordance with the provisions contained in ARM 17.8.752, mercury emissions from SME-HGS project boiler coal combustion would be controlled through the use of the BACT, which is established through the BACT analysis and determination process. BACT is defined as “an emission limitation based on the maximum degree of reduction for each pollutant subject to regulation under 42 U.S.C. 7410, et seq. or 75-2-101, et seq., Montana Code Annotated (MCA), that would be emitted from any proposed emitting unit or modification which the DEQ, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such emitting unit or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such contaminant. In no event may application of BACT result in emission of any regulated air pollutant that would exceed the emissions allowed by any applicable standard under ARM Title 17, chapter 8, subchapter 3. If the DEQ determines that technological or economic limitations on the application of measurement methodology to a particular class of emitting units would make the imposition of an emission standard infeasible, it may instead prescribe a design, equipment, work practice, or operational standard or combination thereof, in the application of BACT. Such standard must, to the highest degree possible, set forth the emission reduction achievable by implementation of such design, equipment, work practice or operation and must provide for compliance by means that achieve equivalent results...” Since there is no applicable ambient air quality standard for mercury, the DEQ’s authority to regulate mercury is limited to the BACT analysis and determination process.

Due to changes in control technology, BACT is a moving target. That is, a BACT determination made at some point in time may or may not be the same as a BACT determination that is made at a later point in time. BACT requirements established through the BACT analysis and determination process conducted for the SME-HGS application for the Supplemental PD for MAQP #3423-00, which was submitted on May 16, 2006, require SME-HGS to install and operate an IECS . Further, SME-HGS must install and operate mercury specific activated carbon injection (ACI) control technology, if necessary, to achieve the BACT determined mercury emission limit of 1.5 pounds per trillion British thermal unit (lb/TBtu) heat input to the boiler based on a rolling 12-month average, or an emission rate equal to a 90% or greater reduction of mercury in the as-fired coal, as measured in lb/TBtu and based on a rolling 12-month average. A detailed mercury BACT analysis is contained in

Section III.A.7 of the permit analysis to the DEQ's Supplemental PD on MAQP #3423-00, which is incorporated as Appendix I to the DEIS.

Further, pursuant to Montana's mercury rules, which became effective on October 27, 2006, after issuance of the Supplemental PD on MAQP #3423-00, the SME-HGS project will be subject to a mercury emission limit of 0.9 lb/TBtu beginning on January 1, 2010, with the requirement of periodic BACT reviews (every 10 years) to determine whether a different emission limit constitutes BACT at that point in time.

Regarding the use of mercury-specific ACI control technology, which is currently required for the CFB boiler, if necessary, to maintain compliance with the applicable BACT-determined mercury emission limits and controls required under the Supplemental PD on MAQP #3423-00, SME-HGS provided comment indicating that it is SME-HGS's intention to install ACI on the CFB boiler during the initial construction phase of the affected CFB boiler. Based on this comment, the Department will reconsider and reevaluate the current requirement for mercury control from the CFB boiler.

2. *The Audubon program in Montana is very concerned about the recent ten Bald Eagles poisoned by mercury. Is the DEIS going to adequately address this concern about federally protected Eagles, as well as ospreys, pelicans and other fish-eating birds? C14, C95, C134*

The DEIS does not even mention the 10 bald eagles that have suffered from mercury contamination in Montana in the last 8 months. Wildlife species are already demonstrating the impacts of mercury contamination in the environment. The additional mercury pollution from this plant will add to the cumulative impacts and may very well tip the balance for downwind populations. C95, C134

The DEIS ignores the recent studies showing mercury's effect on nonaquatic wildlife. This document relies on 10-year old data to dismiss any effects of mercury on the terrestrial food chain. C95, C134

We are now learning that bald eagles throughout Montana are dying from toxic mercury poisoning, and it is a well-established fact that nearly all the mercury in our environment comes from burning coal. C135

The Fort Belknap Indian Community is very concerned with the recent news article where Wildlife Biologists from the U.S. Bureau of Land Management are launching a study of Bald Eagles that were discovered with toxic levels of mercury, some from Fort Benton, which is northeast of the proposed coal-fired plant. C320

Response: The EIS adequately covers the phenomena of mercury emissions, deposition, methylation, bioaccumulation, and biomagnification and their potential implications for wildlife, especially higher order carnivores such as bald eagles. It was not intended as an exhaustive treatise on mercury. Overall mercury emissions

within Montana, and the United States as a whole, will be declining substantially over the next two decades as a result of coal-fired power plants implementing the federal and state mercury rules. How quickly this can translate into decreases in deposition and reductions in the quantities of mobilized mercury and methylmercury that cause problems for wildlife, fish and consumers of fish is still a matter of some scientific speculation. It is also a function of factors beyond the direct control of U.S. and Montana regulators, such as emissions from coal-rich emerging economies like that of China.

3. *Is there a loan adjustment plan for USDA farmers whose crops have a lower market value from mercury and other assorted pollutants caused by the fallout of toxic emissions from the Highwood Coal Plant? C14*

SME needs to be prepared to compensate farmers and ranchers for reduced agricultural land values and to compensate individuals for diminished real estate values for the industrialized and contaminated landscape. Will they be required to post a bond to cover the cost of future cleanup of the site? C20

How will SME compensate farmers for mercury contamination if ever detected, assuming the USDA – the farmer’s friend – is going to fulfill its charter and do soil analysis and baseline studies? C80

I am an organic farmer 23 miles northeast of Great Falls in the wind shadow of the proposed coal-fired plant. We also do some irrigating from the Missouri River. In reviewing the DEIS, I have a few questions. I see the conclusion that there will be no appreciable damage to agricultural land. However, I do not see any numeric standards on which this conclusion is based. Where are these located? On what standard was this conclusion based? As an organic farmer, I can only have a small percent of the EPA standards for acceptable emissions. Where are these EPA limits listed? In order to determine pollution of agricultural land, there needs to be a baseline study, and also subsequent monitoring test of agricultural land and water in the wind shadow. In regard to these tests: What is the procedure and what equipment is necessary to gather samples of soil and water? Who will be doing the analysis and what are their credentials? Who will be paying for these tests? Where, in the DEIS, is there provision for a compensation fund to compensate for loss of agricultural income? Where are the regulations for paying this compensation? Will this compensation be in perpetuity? Where is there provision for remuneration of health care costs for residents in the wind shadow, and for those who consume contaminated products produced in the contaminated area? I look forward to your response, and to adjustments in the EIS. C307

Response: The air emissions from the HGS would be controlled under federal and state law and there is no evidence that agricultural lands would be affected by the emissions, so compensation for such speculative losses is not available.

4. *Will baseline levels of mercury, arsenic, beryllium, cadmium, manganese, and lead be obtained from water and land samples in a 100 mile radius of the plant? Will baseline pH determinations be made of the agricultural land around the coal plant to assure that emissions do not harm crops with acid rain or toxic heavy metals. Will organic farmers and local gardeners suffer adverse economic and health consequences? Will there be real time monitoring of the pollutants with data made available to the public? C20, C50 C80, C307*

Studies from Steubenville, PA by the federal Environmental Protection Agency show that 70% of mercury depositions occur close to the plant. I do not see where in the DEIS the mercury depositions from the plant are being measured as effects the human population centers and compared with other alternatives such as wind, hydro, conservation, solar. As part of the air quality permit and the alternatives under the DEIS, potential deposition of mercury in Great Falls City proper when the wind blows from the North and/or East needs to be studied and then addressed. C78

There is nothing in the Draft EIS concerning existing conditions with respect to amounts of mercury currently present in the prevailing wind settling area of the Highwood plant. How can you legitimately say that this “settling zone” can safely accommodate 40 pounds of mercury a year when there is no data on the amount of mercury in that area now? C294

Response: Mercury, arsenic, beryllium, cadmium, and manganese are pollutants for which no current NAAQS and MAAQS currently exist. Therefore, while establishing baseline levels for these pollutants in the surrounding environment and monitoring any increases potentially caused by the SME-HGS project would provide the DEQ and affected public with additional information on local environmental concentrations and SME-HGS project specific deposition data, the DEQ does not have the regulatory authority to further limit these emissions from the plant based on this information and data. However, the above-cited trace-metals are regulated under the DEQ’s Supplemental PD on MAQP #3423-00 through the Department’s BACT analysis and determination process, which requires that SME-HGS employ fabric filter and co-benefit SO₂ controls for trace metals emissions. More detailed information regarding the control of trace metals is included in Section III.A.6 of the permit analysis to the DEQ’s Supplemental PD on MAQP #3423-00. Therefore, the Supplemental PD for MAQP #3423-00 does not require ambient monitoring of these pollutants.

Lead emissions are regulated by NAAQS and MAAQS. Computer modeling conducted as part of the MAQP process has demonstrated that all potential lead impacts from the proposed project would be in compliance with the NAAQS and MAAQS. In accordance with DEQ policy related to ambient monitoring, because lead emissions from the proposed project are relatively minor the Supplemental PD for MAQP #3423-00 does not require ambient monitoring of lead.

5. *Mercury enters the food chain through consumption of fish tainted with mercury. Fish bioaccumulate methyl mercury, which is mercury in its most dangerous form. Fish are an important source of dietary protein and essential fatty acids, so while at the same time we are advising patients to increase consumption of heart and brain healthy fish, we are also giving conflicting advice.... This conflicting advice is especially challenging for women of child bearing age, since essential fatty acids are needed for normal brain development in the unborn child, yet mercury is so slowly excreted from the body that much of the damage could be done before the woman even realizes that she's pregnant. Many of Montana's lakes already have fish advisories that limit consumption of fish because of mercury contamination. At nearby Tiber Reservoir it is recommended that a young woman not eat more than one 6 oz. serving of walleye a month. The amount of mercury in a single teaspoon can make the fish in a 1000 foot-acre lake unfit for consumption. C20, C95, C134, C176*

Mercury is very dangerous to embryos and fetuses, where it is concentrated in the placenta and enters the body of the unborn child, where its damaging effects are most evident within the developing brain. One out of six American women of child bearing age already have blood levels of mercury that exceed federal guidelines. This puts approximately 600,000 babies at risk in the US alone. C20, C176

Methylmercury ingestion at different levels is correlated with a variety of toxic effects, including Minamata's disease, autism in children, cardiovascular risk, and neurologic damage. C20

The data on the public health impacts of mercury and methylmercury is overwhelming. These public health impacts include neurodevelopmental effects, neurotoxic effects, autism rates that increased with mercury emissions in a Texas study, hypertension, cardiac abnormalities in children, interference with the development of the central nervous system especially in children, visual impairments, hearing deficits, motor and mental disturbances, toxic effects on the immune system, an increase in allergic reactions, and cardiac function in adult males. C95, C134

Mercury is wending its way through the food chain and making its way into the wombs of pregnant women, causing irreparable neurological damage to unborn children. C135, C206

The spike of autism in the United States has a direct correlation with the increase of mercury in the environment much of which is produced by coal burning power plants. C170

Coal-fired power plants are proven to be the most polluting way to generate electricity. Montana is accountable for 92% of the mercury that pollutes the air. Mercury, a potent neurotoxin, used in coal-fired power plants are released when the ore deposits are burned during this process to generate electricity... The damages from exposure to these neurotoxins impacts the young, the old, the unborn, and the environmental essence in general. In women and children mercury can cause developmental malformations,

visual impairments, and mental disturbances among much more drastic complications that are irreversible. C187, C204

In the future I plan on having children of my own and while my fetus is growing inside of me I want it to be healthy and strong and I want my baby to grow without me having to worry about if my child is going to come out with an extra finger or eye....If we keep putting these plants up what is going to happen to America are we going to all become vegetables in our near future when you think of this and you still want a plant what kind of person will that make you....Methyl mercury is dangerous to the developing brain and nervous system. C200

The methyl mercury that all power plants give off damages developing brains and nervous systems. These power plants are the main source of mercury in Montana's air. Meaning that it causes neurological disorders, development disabilities, cardiac disease, impairs fetal development and hearing and visual impairments. C201

When we was talking about the power project in class the first thing that I thought of was my baby, and ever ones kids, and I thought why should babies be born in the world that has neurological disorders, developmental disabilities, visual and hearing impairment, All women that are having babies want what's best for there babies. It will be hard for the moms to do that with everything wrong with them all because of the power project. C203

Response: Thank you for your additional information on mercury's toxic effects.

6. *The audience was told during the Havre hearing in early August that this plant would produce about 1000 lbs of mercury during it projected life span of 35 years of production. During the first "Open House" in October 2004, I was told that it would produce about 44 lbs per year and then somewhere of magic our community was told last spring, 2006, that this would be 22 lbs per year by SME employees and it would mean that 770lbs. If it emits between 40 and 44 lbs a year this would mean that more than a ton and a half of mercury would be spewed out into the air. Is it that SME does not know how much mercury is going to be spread on the land via its exhaust stack? And therefore one must conclude that "clean" coal burning is a myth. C29*

The developers of the coal plant have not been honest and forthcoming with their presentation to our city officials. Mr. Gregori of SME told city commissioners that the plant would only produce 21 pounds of mercury a year while at the same time the proposed permit allows 45 lbs per year. C78

I live somewhat down wind from Colstrip. Colstrip is about five times or a little over five times larger than this proposed plant. At the present time, and since its inception, its been putting out probably eight times as much mercury per kilowatt hour produced than this plant will. In other words, it's probably been putting out about 40 times as much mercury as what this proposed plant will. If the opponents really wanted to get rid of a

lot of mercury, they should suggest that we build all new plants similar to this one, because this will take care of as much mercury as the touted IGCC plants would. C139

Response: The mercury emission rate resulting from a coal combustion unit is a function of the characteristics of the combustion unit itself, the amount of mercury in the coal combusted, the form of mercury in the coal combusted, and the control efficiency of the required emission control equipment. The DEQ's Supplemental PD for MAQP #3423-00 requires that mercury emissions be controlled by IECS and ACI, if necessary, to comply with the BACT-determined mercury emission limit(s) of 1.5 lb/TBtu heat input to the boiler based on a rolling 12-month average, or an emission rate equal to a 90% or greater reduction of mercury in the as-fired coal, as measured in lb/TBtu and based on a rolling 12-month average. Mercury emissions from the proposed SME-HGS project would be variable depending on the concentration of mercury in the coal combusted for boiler operations. Mercury emission estimates using the applicable emission limit of 1.5 lb Hg/TBtu and a boiler heat input of 2626 million British thermal units per hour (MMBtu/hr) to 2771 MMBtu/hr (permitted boiler average and maximum heat input capacities), results in an estimated mercury emission rate for the SME-HGS project ranging from 34.5 to 36.4 pounds per year.

Further, pursuant to Montana's mercury rules, which became effective on October 27, 2006, after issuance of the Supplemental PD on MAQP #3423-00, the SME-HGS project would be subject to a mercury emission limit of 0.9 lb/TBtu beginning on January 1, 2010, with the requirement of periodic BACT reviews (every 10 years) to determine whether a different emission limit constitutes BACT at that point in time.

7. *MDEQ has determined that the appropriate mercury BACT emissions limit(s) for the proposed project incorporating the IECS would be either:*

- *90 percent mercury reduction, based on a 12-month rolling average, or*
- *1.5 lb mercury/TBtu (trillion Btu), based on a 12-month rolling average.*

It would be helpful if additional explanation was provided regarding application of this two part mercury emission limit in the air quality permit (i.e., clarify the condition that would trigger one limit or the other). C36

While it has been widely reported that the Highwood plant would control 90% of its mercury emissions, this standard is not imposed as a firm requirement in the draft air quality permit. In reality, the proposed emission limit of 1.5 pounds per trillion Btu would result in as little as 26% of its mercury emissions being captured. C95, C125, C134

The DEIS suggests that the company could chose at any point in time whether to comply with a percentage reduction in mercury emissions or an emission limit for that time. Instead, the company should have to choose one or the other at the outset. It cannot switch back and forth, at will, on a hourly or monthly basis. This would be

unenforceable. The EIS contemplates allowing an emission limit of higher than 1.5 lbs/TBtu by allowing the company to switch back and forth between these two standards. This is wholly unacceptable and the impacts of a higher emission limit than 1.5 lbs/TBtu would have to be thoroughly analyzed. C95, C134

Response: The mercury emission limits applicable to the CFB boiler are 1.5 lb/TBtu based on a rolling 12-month average, or an emission rate equal to a 90% or greater reduction of mercury in the as-fired coal, as measured in lb/TBtu and based on a rolling 12-month average. Because the limit(s) require no more than 1.5 lb/TBtu or 90% reduction, the applicable emission limit would be whichever limit is less stringent. The BACT process determined the level of control to be the less stringent limit based on operations.

Further, pursuant to Montana's mercury rules, which became effective on October 27, 2006, after issuance of the Supplemental PD on MAQP #3423-00, the SME-HGS project would be subject to a mercury emission limit of 0.9 lb/TBtu beginning on January 1, 2010, with the requirement of periodic BACT reviews (every 10 years) to determine whether a different emission limit constitutes BACT at that point in time.

8. *Despite claims of mercury caused by Yellowstone Park, coal-fired power plants cause 92 percent of the human caused airborne mercury, 75 percent of all mercury. And as of to date, there is still no rules for mercury controls. C48*

Mercury emissions are another issue fully explained. I am glad that the DEIS fully gives the total of the natural mercury released yearly, how much present coal plants emit yearly and how much the HGS will emit. I believe, however, the goal for HGS is somewhat less than 34.5 pounds. I hope this plant will be an example to all other coal plants in Montana that there is more efficient way to burn coal. C306

Response: SME-HGS would be required by permit to control mercury emissions from the boiler. The applicable mercury emission controls were established through the BACT analysis and determination process. SME-HGS would be required to control mercury emissions from the boiler through the operation of IECS. Further, SME-HGS would be required to install and operate mercury specific ACI control, or an equivalent technology, as necessary, to achieve the BACT determined mercury emission limits.

Further, pursuant to Montana's mercury rules, which became effective on October 27, 2006, after issuance of the Supplemental PD on MAQP #3423-00, the SME-HGS project would be subject to a mercury emission limit of 0.9 lb/TBtu beginning on January 1, 2010, with the requirement of periodic BACT reviews (every 10 years) to determine whether a different emission limit constitutes BACT at that point in time.

9. *The amount of mercury (40 lbs - from the revised draft air quality permit) and lead (560 lbs) to be released by this power plant each year is of particular concern to citizens with children living in the vicinity or downwind of the power plant. Over the course of fifty*

years, what will the estimated 2,000 lbs of mercury and 28,000 lbs of lead deposited on Golden Triangle farmlands and cities do to our health and the environment? C50

Response: Lead (Pb) concentrations in ambient air are regulated through protection of the NAAQS and MAAQS. The Clean Air Act, which was last amended in 1990, requires EPA to set NAAQS for wide-spread pollutants, including Pb, from numerous and diverse sources considered harmful to public health and the environment. The Clean Air Act established two types of NAAQS, primary and secondary standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings. Through the application process for the Supplemental PD on MAQP #3423-00, SME-HGS has demonstrated compliance with the applicable NAAQS and MAAQS, as required for permit issuance. Pb emissions from the proposed CFB boiler would be limited by operation of the BACT-determined fabric filter particulate control requirement. A more detailed discussion of the Pb BACT determination is included in Section III.A.6 of the permit analysis to the DEQ's Supplemental PD on MAQP #3423-00.

There are currently no NAAQS and MAAQS for mercury. Therefore, ambient concentrations of mercury are not currently regulated through protection of a primary or secondary standard; rather, in accordance with the provisions contained in ARM 17.8.752, mercury emission rates and control strategies are regulated in Montana through implementation of BACT. Further, pursuant to Montana's mercury rules, which became effective on October 27, 2006, after issuance of the Supplemental PD on MAQP #3423-00, the SME-HGS project would be subject to a mercury emission limit of 0.9 lb/TBtu beginning on January 1, 2010, with the requirement of periodic BACT reviews (every 10 years) to determine whether a different emission limit constitutes BACT at that point in time.

An MAQP issued by the DEQ provides the owner and operator of an affected source of air pollution with a license to emit regulated levels of air pollutants, including mercury. The purpose and intent of current Montana and Federal law regulating industrial sources of air pollution is to allow for business and economic development while maintaining a clean and healthful environment through appropriate regulation of the affected source. Through the permitting process for MAQP #3423-00, SME-HGS has demonstrated compliance with all applicable requirements of law, as required for permit issuance.

- 10. The DEIS does not provide a monitoring plan to validate and address the effects of airborne pollutants on local surface waters and aquatic organisms. Background monitoring would be needed to establish baseline levels of mercury and other pollutants. Fish should also be sampled to determine potential bio-concentration of mercury as it moves up trophic levels. Control sites could be selected to help differentiate between the proposed generating station's effects and other major pollution sources. Without an*

aquatic monitoring plan, it will be impossible to know the ultimate fate of released toxins and the associated human health risk to downwind Montana communities from surface water contamination. C78

The effects of particulate matter, acid rain, mercury deposition under a range of alternatives as it affects area farmland needs to be considered and compared under the various alternatives. There are no tests showing baseline levels on area farmland currently present for pollution from the plant. It is not sufficient to say that airborne contaminants will not have a significant impact on area farmland without having a standard, a baseline study and a method of monitoring. C78

Response: In place of ambient monitoring for regulated pollutants, the air quality permitting process requires computer modeling to demonstrate that the proposed project will not result in ambient concentrations of pollutants considered harmful to public health and the environment. Limits and conditions in the permit are then set based on parameters modeled or on more stringent limits established through the BACT analysis and determination process. Computer modeling is conducted only for those pollutants for which a NAAQS and MAAQS currently exists and for which there is project specific concern. The Clean Air Act, which was last amended in 1990, requires EPA to set NAAQS for wide-spread pollutants from numerous and diverse sources considered harmful to public health and the environment. The Clean Air Act established two types of NAAQS, primary and secondary standards. Primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against visibility impairment, and damage to animals, crops, vegetation, and buildings. The MAAQS are at least as stringent, or more stringent than, the NAAQS. SME-HGS has demonstrated compliance with the applicable NAAQS and MAAQS for CO, NO_x, Ozone (VOCs are regulated as a precursor to ozone formation), Pb, PM₁₀, SO₂ as well as hydrogen sulfide and visibility impact standards for the proposed project. Therefore, the Supplemental PD for MAQP #3423-00 does not require ambient monitoring for Criteria Pollutants.

Mercury is a pollutant for which no current ambient air quality standard exists. Therefore, while establishing baseline mercury levels in the surrounding environment and monitoring any increases potentially caused by the SME-HGS project would provide the DEQ and affected public with additional information on local environmental mercury concentrations and SME-HGS project specific mercury deposition data, the DEQ does not have the regulatory authority to further limit mercury emissions from the plant based on this information and data. Mercury limits and conditions in the permit were established through the BACT analysis and determination process. Therefore, the Supplemental PD for MAQP #3423-00 does not require ambient monitoring of mercury.

11. *What levels of mercury could be expected in the type of coal that was mined near Great Falls, especially since SME 'speculated' that mining local coal could be a 'remote' possibility? C80*

Response: The DEQ is unaware of speculation that SME-HGS intends to mine and utilize coal from a site near Great Falls. While the Supplemental PD for MAQP #3423-00 does not specifically preclude the use of a coal source near Great Falls, compliance with various requirements contained in the Supplemental PD for MAQP #3423-00 (which are based specifically on the combustion of Powder River Basin coal as proposed by SME-HGS) would be dependent on the combustion of coal similar to that analyzed under the permit action. Regardless of the coal fuel source used for operations, SME-HGS would be required to comply with the requirements of the air quality permit.

12. *The Draft EIS claims that mercury does not deposit locally and therefore the impacts from this coal plant will be insignificant. This is simply not true. Research conducted by the U.S. Environmental Protection Agency proves that mercury deposits locally. Studies demonstrate that mercury deposits locally, mercury levels are higher near coal-fired power plants and that when mercury emissions decrease locally, mercury levels in fish decrease as well. C95, C134*

Although the DEIS cites the previously mentioned Steubenville Ohio study in the list of references, there is no mention of it in the text of the document. C95, C134

Response: We are aware of the EPA-funded Steubenville, Ohio study, which had not yet appeared in print at the time the DEIS was under preparation. The findings of this study indicate higher levels of local deposition of mercury emitted from eastern power plants using eastern coal sources than previously thought. Its relevance to western coal sources is uncertain at this time. Our understanding of mercury's fate once emitted to the air continues to evolve and advance, and regulatory programs evolve accordingly, implementing stricter standards when science indicates their necessity. Montana's mercury rules, adopted after the results of the Steubenville study were publicized, are based, in part on concern for local depositions.

13. *The DEIS says that the no action alternative would lead to higher mercury emissions. This is unsubstantiated, and completely erroneous. There are many ways to generate electricity that have NO mercury emissions. This assumes that only dirtier coal will be used to fill electricity needs. C95, C134*

Response: The FEIS indicates that due to the inability to predict precisely which sources of generation would provide power to SME, it is impossible to state whether mercury emissions would be equal, lower, or higher.

14. *The EIS erroneously says that controlling mercury from subbituminous coals is highly variable. This is simply not true. This is based on outdated information and should be updated. C95, C134*

Response: The majority of research on controlling mercury from coal combustion has been done on eastern coals. Some research has been completed on subbituminous coal, but only for short test periods in a limited number of boilers. Hg emission control on subbituminous coal has been shown to be variable and dependent on the availability of chlorine or other halogens. Until SME's test burn, no Hg emissions data existed for Powder River Basin Coal in a CFB boiler; and those data were in a pilot scale facility for a short term test. More data are needed through longer term tests to fully characterize Hg emissions from different coals in different boiler and pollution control configurations.

15. *The actual emissions of this plant could be over 46 pounds per year based on the emission limit of 1.5 lbs/TBtu with the ability to raise that limit if the coal mercury content is high. That could result in more than one ton of mercury entering the downwind environment over the life of the plant. The EIS fails to consider this cumulative impact. C95, C134*

Mercury is an unacceptable pollutant at any level. C111

Response: There are currently no NAAQS or MAAQS for mercury. Therefore, ambient concentrations of Hg are not currently regulated through protection of a primary or secondary standard; rather, mercury emission rates are regulated in Montana through implementation of BACT in the air permitting program. The Supplemental PD for MAQP #3423-00 addresses allowable mercury emissions through the BACT analysis.

The DEQ's Supplemental PD for MAQP #3423-00 requires that mercury emissions be controlled by IECS and ACI, if necessary, to comply with the BACT determined mercury emission limit(s) of 1.5 lb/TBtu heat input to the boiler based on a rolling 12-month average, or an emission rate equal to a 90% or greater reduction of mercury in the as-fired coal, as measured in lb/TBtu and based on a rolling 12-month average. Therefore, mercury emissions from the proposed SME-HGS project would be variable depending on the concentration of mercury in the coal combusted for boiler operations. Mercury emission estimates using the applicable emission limit of 1.5 lb Hg/TBtu and a boiler heat input of 2626 million British thermal units per hour (MMBtu/hr) to 2771 MMBtu/hr (permitted boiler average and maximum heat input capacities), results in an estimated mercury emission rate for the SME-HGS project ranging from 34.5 to 36.4 pounds per year.

16. *If we're going to have mercury being emitted, I think it's only right that the people down wind know how much is coming their way. And with computer modeling, it would not be difficult to show and tell publicly what those people can expect from this plant. Over different parts of the year, different emissions would be coming in different directions.*

And those at high risk, those who are expecting to have problems could be advised to leave that area, rather than be exposed to something that would deteriorate their health more. If the companies and owners are not wanting to do that, maybe they should have some responsibility and liability in the bills that would be accumulated by the deteriorating health of these people. C110

Response: Neither Montana nor federal law contains regulations for ambient concentrations of mercury. There would be no standard against which to compare the mercury modeling results.

17. The effects of mercury on human health are cumulative. What is a little bit today, over the course of time becomes a lot. 55 pounds sounds like nothing, but it was certainly enough to make mercury thermometers illegal because that little tiny bit inside the mercury thermometer multiplied by many, many households meant that there would be children born brain damaged. In fact there would be people suffering from neurotoxins, because, make no mistake, mercury is, no matter what anyone wants to say, it is a neurotoxin. It does not belong in our environment, and it accumulates over time. It accumulates in the plants. It accumulates in the animals. We eat the animals. It accumulates in our body. It accumulates over generations. C118

Response: Thank you for comment.

18. Page 3-36, Section 3.3.5, third paragraph. "inorganic forms of mercury" should be "mercurous and mercuric forms of mercury". Elemental mercury (Hg0) is also an inorganic form of mercury. C128

Response: This change has been made.

19. Page 3-37, Figure 3-19. Is it possible to modify this figure to show "Industrialization (circa 1880 to present)" as covering that time period? This label currently falls after "WW II manufacturing" which is 1940-1945. The two labels are thus not in chronological order. Labels are also not aligned consistently on the graph. For example, Tambora lies directly to the right of the corresponding peak but Krakatau lies above its peak and Mt. St. Helens appears to lie below its peak. Most readers should be able to figure out how the labels correspond to the graph but it would be best if the labels are modified. C128

Response: The errors in this graphic are acknowledged. However, even with these errors it has value in showing the spikes in mercury deposition associated with industrialization. The figure comes from another publication, and modifying it would require obtaining permission from the author and publication to do so.

20. Page 3-38, first paragraph, third line. The reference is listed as "EPA, 2006". Is this EPA 2006a, or 2006b? C128

Response: The reference is "EPA, 2006a."

21. Page 3-40, top of the page. SME suggests it would be appropriate to discuss regional mercury deposition patterns. While data on the U.S. as a whole are helpful, data for the Western U.S. would be even better (i.e., it seems likely that for the Western U.S., including Montana, the contribution from non-U.S. sources is likely to be well above 80%). C128

Response: The agencies were unable to find additional references specifically concerning Western U.S. regional mercury deposition patterns in time for the preparation of the FEIS.

22. Page 3-41, top of the page. SME suggests it would be appropriate to indicate how Montana's proposed mercury rule is more stringent than federal regulations. For example, "Montana's proposed mercury emissions rule for coal-fired generating plants will incorporate standards requiring 80-90% control of mercury emissions compared to approximately 70% control under CAMR, and as early as eight years before CAMR deadlines." C128

Response: Pursuant to Montana's mercury rules, which became effective on October 27, 2006, after issuance of the Supplemental PD on MAQP #3423-00, the SME-HGS project would be subject to a mercury emission limit of 0.9 lb/TBtu beginning on January 1, 2010, with the requirement of periodic BACT reviews (every 10 years) to determine whether a different emission limit constitutes BACT at that point in time. In all aspects, the Montana mercury rule is at least as stringent, and in many aspects more stringent, than the recently promulgated Federal Clean Air Mercury Rules.

23. Page 3-41, Figure 3-24. If feasible, the statement "Mercury transforms into methylmercury in soils and water..." should be changed into "Mercury transformed into methylmercury in sediment...". First, mercury does not transform itself. Second, the methylation process generally requires reducing conditions which would not be present in most water or soil but are often found in aquatic sediments. C128

Response: Comment acknowledged. Mercury does not transform itself but is transformed to methylmercury via bacterial action. However, even with the wording in the figure, the figure has value in showing mercury exposure pathways. This is an EPA figure that cannot be modified.

24. Page 3-41, fourth paragraph. The first sentence, "Plants, animals,water and food" refers to concerns about mercury in general, not specifically methylmercury as discussed in this section and seems out of place. As an alternative, move the sentence to the beginning of the preceding paragraph. C128

Response: This change has been made.

25. Page 3-42, first paragraph. The WHO/ATSDR estimates are for the general population. Consider changing the text to "...99.6 percent of methylmercury intake in the general

population arises from fish consumption...". We are also unsure of the value in citing inorganic mercury intake data here. The focus of this section is methylmercury and the inorganic mercury data seem out of place. If the inorganic mercury intake text is retained, the DEIS might consider indicating that inorganic mercury is associated with other components of the diet [i.e., not fish]. C128

Response: This change has been made.

26. *Page 3-42, second paragraph. Consider changing "first symptoms" to "most subtle effects". First symptoms implies frank toxicity as well as immediate effects, as opposed to subtle effects which may occur at a later time point. The fish consumption guidelines are based on a reference dose that considers very subtle neurodevelopmental effects (so subtle they are evident only when studied across populations, not in individuals) which are detected well after exposure. C128*

Response: This change has been made.

27. *Page 3-42, fourth paragraph. The DEIS should provide a reference for the concentrations of mercury in commercial tuna fish. Carrington and Bolger (Risk Analysis, 2002, Vol. 22(4), pp. 689-699) report a value of 0.17 ppm. C128*

Response: The range of methylmercury concentrations in canned tuna was obtained from the Montana Department of Public Health and Human Services (MDPHHS) reference cited at the end of the paragraph.

28. *Page 3-43, first paragraph. There is some mixing of the effects of different forms of mercury in this paragraph. We suggest the following revision:*

"Mercury is a well-documented human toxin at sufficiently high doses. For example, clinically observable neurotoxicity has been observed following exposure to large amounts of inorganic mercury (e.g., "Mad Hatters Disease"). Consumption of highly contaminated foodstuffs (e.g., methylmercury contaminated fish or grain) has also induced acute neurotoxicity. The most subtle effects of mercury are believed to be associated with methylmercury exposure during pregnancy. Effects on individuals exposed in utero at comparatively low doses may include impaired cognitive test performance and deficits in sensory ability. These effects may progress to tremors, inability to walk, convulsions and death if exposure levels are extremely high (EPA, 1997e). High exposures to inorganic mercury may also result in permanent kidney damage (EPA, 2003)." C128

Response: This suggested change in wording has been adopted.

29. *Page 3-43, fourth paragraph. This paragraph should provide data on levels of mercury that caused adverse effects in wildlife and associated references. A recent study by Weech et al. (Weech SA, Scheuhammer AM, Elliott JE. Mercury exposure and reproduction in*

fish-eating birds breeding in the Pinchi Lake region, British Columbia, Canada. Environ Toxicol Chem. 2006 25(5):1433-40) suggested that reproductive effects occur above an egg mercury concentration range of 0.5-1.0 microgram/gram wet wt. These authors studied a lake polluted by former mining activities and found that reproductive success of bird species was not adversely affected when compared to neighboring lakes not influenced by mining waste. C128

Response: Volume VII of the 1997 EPA Mercury Study Report to Congress, from which this paragraph is drawn, included a review of the entire mercury literature to date on the effects of mercury on wildlife – thousands of scientific studies. The study above adds to this continually growing literature, and will help further refine our ever-growing knowledge of mercury's impacts.

30. Page 3-43, final paragraph. *"In the industrialized era, human activities have mobilized greater amounts of mercury, thereby exposing organisms, ecosystems, and human beings to a particularly toxic form, methylmercury." The statement implies that methylmercury exposures are only due to human activities. There were undoubtedly methylmercury exposures prior to the industrial era, although they presumably involved lower levels than they do today. It might be better to end with: "...to increased levels of mercury, including increased levels of a particularly toxic form, methylmercury."*

"In low doses, methylmercury can be voided by the body and is not generally problematic...". In order to make this sentence accurate, it should be "low, periodic or occasional doses". A low but sustained dose would not be entirely eliminated by the body, because the half-life is 70 days whether the dose is high or low. However, the resulting body mercury levels may never be sufficient to produce health effects if they remain below the toxicological threshold. "While mercury contamination is widespread, indeed global, the most serious incidents to date have tended to involve specific point source discharges to water..." We suggest this statement should be more definitive: "While mercury contamination is widespread, indeed global, cases involving serious health impacts have arisen from specific point source discharges to water or accidental food contamination rather than dispersed emissions to air." C128

Response: The suggested changes have been made.

31. *The compartmentalized structure of the document does not cross reference important facts from one section to another in a meaningful way. For example, a rather thorough treatment of hazards of mercury poisoning stands alone (3.3.5), so that sections dealing with biological resources (4.6.2) or recreation (4.8.2) do not even mention this important subject. The sections do not interact well enough to reach the predictable conclusion that the suggested edibility of fish caught in local streams will be compromised. There is no warning here about maximum number of fish per month a pregnant woman may safely consume, how that may have an adverse effect on recreation or the socioeconomic environment. C10*

Response: More cross references have been added to the FEIS. Predictive models are not available that could link mercury emissions from a CFB plant to contamination in local streams. The warning about the maximum number of fish per month per month a pregnant woman may safely consume is outside the scope of this EIS. The monitoring of fish contamination and posting of consumption advisories is the responsibility of Montana Fish, Wildlife and Parks.

**AIR-603 AIR QUALITY – GREENHOUSE GAS EMISSIONS AND CLIMATE
CHANGE**

1. *Most knowledgeable researchers agree that we should be reducing carbon dioxide and other greenhouse gases in the atmosphere, not adding to them. It's accepted by very qualified scientists that there is a strong probability that this compound is affecting global climate in a negative way. C1, C4, C20, C64, C75, C134, C284*

The CFB technology releases a disproportionate amount of CO₂ in the atmosphere. C4, C61, C82, C88, C125, C146, C335

The proposed Highwood plant would also release massive quantities of carbon dioxide and nitrous oxides, greenhouse gases that contribute to global warming. Although not currently regulated federally, several western states are developing regulations for these gases and Montana will probably join these states before the Highwood project is completed. At this point, no firm methods of eliminating or mitigating this pollution have been proposed or required for the air quality permit. C12, C20, C81

I feel that with global warming in full view we here in Montana, we must do what we can to slow the process. The plant would pour millions of tons of greenhouse gases into the air, as well as other toxics. Other good reasons to stop this waste of energy include: shipping a million tons of coal from S.E. Montana per year. Think of all the fuel that will waste, more greenhouse gas. C35, C87

The DEIS says this one plant would release about three million tons worth of CO₂ and other global warming gases each year. It will increase Montanans' overall greenhouse emissions by 7.5 percent. There is no plan for controlling the CO₂ emissions. And the EIS doesn't consider the cost of retrofitting the plant to convert CO₂ and control it. C48

How much greenhouse gas emissions will result from vehicles having to deliver limestone to the HGS-Salem site from Limestone Hills, south of Helena in Townsend? C80

Global warming is the most serious environmental threat facing the planet today, and unlike any we have encountered before. The copious quantities of global warming pollution that would be released by Highwood would only add to this dire problem. C95, C134, C164

The comments on page 4-54 reflect the true devastation from this power plant. Comments are made that there is not enough arable land in the world to sequester the carbon dioxide from this plant as well as other sources of greenhouse gases. This points out that we need to be going a different direction with power generation. If we cannot offset the carbon dioxide created from this plant then we should not be building it. This will only accelerate the global warming problem. C104

Other developed, industrialized countries in the world with a similar or higher standard of living and quality of life use half or less fossil fuel per capita than we do in the United

States. And among the 50 states, Montana has one of the highest per capita rates of CO₂ production, even without counting that produced by generating electricity for export -- about half of our total generating capacity. Most other industrialized nations have already agreed to limit CO₂ production -- the so-called "Kyoto Protocols" which are designed to absolutely decrease CO₂ production by 10% or more by 2010 in the signatory countries. (In contrast, the Highwood Station alone will increase Montana's total CO₂ emissions by about 7% - a direct violation of Kyoto and other climate mitigation strategies.) Only Canada and Australia use similar amounts per capita of fossil fuel (and thus produce CO₂), and both of those countries are now attempting to meet or exceed the Kyoto standards. China, India, and Russia have joined us in refusing to endorse Kyoto, but those countries use one-fourth or less fossil fuels per capita as we do, and they are amenable to agreements which don't put them at a relative disadvantage to countries which already pollute much more. If the United States was to join or advance this effort, the rest of the world would have to follow, or else face trade sanctions and other penalties which would quickly persuade them to join. In Europe, an \$11/ton carbon tax is already in effect, virtually precluding further building of coal or other fossil fuel power generating plants which release most or all of their CO₂ into the atmosphere. C134

Instead of acknowledging the role of fossil fuel consumption in global warming, our federal and state governments have fought it continuously, and several large corporations have spent 10's of millions of dollars sponsoring false science and disinformation campaigns. Since Hurricane Katrina a year ago, the mass media, the scientific community, and many national and regional environmental groups and state agencies have moved to reduce CO₂ production by signing on with Kyoto or otherwise limiting greenhouse gas emissions voluntarily. Several states including California have independently adopted Kyoto standards or better to reduce the impact of global warming on their coastlines and agricultural production. Montana should actively pursue this issue in the next Legislature, and we are already promoting legislation and lining up sponsors. C134

The actual minority opinion on global warming is the one I support. The actual minority position on global warming is not the handful of scientists who say it doesn't exist. The minority opinion on global warming is, there's hundreds of scientists that think this way, is it's going to be much worse and much faster than anybody currently realizes. Therefore, this dirty power plant is risky, expensive, and unreliable. C151

Montana is a very rural state that depends on our ranch and farmland as well as the tourism based on our wild lands and hunting. We are currently in our 7th year of drought that has cost of millions of dollars in loss in all these areas. I believe, as do many recent climate models, that this drought is greatly influenced by excessive CO₂ levels that we have put into our atmosphere...The DEIS for the HGS does not address the addition of so much CO₂ to the atmosphere of our area. It does not sufficiently address impact to the local flora and fauna surrounding the site and it does not address the more global aspects of additional CO₂ in our atmosphere. Furthermore, the DEIS does not address the CO₂ emissions that will be indirectly caused by the needed transport of the coal to

the Highwood plant from distant mines...I would encourage you to address the CO2 effects in more than the three pages currently set aside in the DEIS. The issue is much more encompassing than can be addressed in so brief a format. C172

Global Warming Pollution increased 18% between 1990 and 2003 in carbon dioxide emissions. But again 98% of carbon dioxide emissions in the United States come from the burning of fossil fuels. C204

As designed, the project would needlessly threaten environmental quality by emitting millions of tons of global warming pollution each year. C116, C209, C210, C212, C213, C214, C215, C216, C217, C218, C219, C220, C221, C222, C223, C224, C225, C226, C227, C228, C229, C230, C231, C232, C233, C234, C235, C236, C237, C238, C239, C240, C241, C242, C243, C244, C245, C246, C247, C252, C253, C274, C278, C282, C285, C286, C287, C288, C295, C300, C310, C315, C319, C330

Global warming is real. The speculation has ended. The science cannot be refuted....Great Falls should not contribute to this worldwide problem by building a power plant, which the local area does not need for its immediate, and long-term electricity needs. C248, C288

With global warming worsening, the last thing Montana, the U.S. and the world needs is another coal-fired power plant, especially one using 20 year old technology, one producing power that may not be needed in Montana & a company that may fail....We are interested in reducing greenhouse gases, not increasing them. We need to require the use of the latest technology & alternative sources of energy to insure the healthy future for mankind. C258

The HGS will emit over 3 million tons of CO2 per year...the equivalent of adding a half million vehicles to our roadways in Montana. What, specifically will be done to mitigate this pollution and its effects on global warming? C294

It is unfathomable, knowing what we know about global warming and the universal consequences of burning fossil fuels, that this project can be moving forward. How can an agency of this state, charged with protecting the health and welfare of the citizens of Montana...and morally, the health and welfare of human beings everywhere...be on the verge of allowing this proposal to be permitted? It is simply astounding. C297

I am writing this on salvaged paper in order to reduce the cutting of trees which are necessary to offset the CO₂ emissions of coal fired power plants.... So the reason I am writing this is to ask that you publicly denounce this project for what it truly is: an outdated, unnecessary and ultimately suicidal undertaking. I ask that coal fired generation end. C298

I've just finished reading Bill McKibben's book The End of Nature and plants like Highwood only hasten our global warming problems. C309

Have you seen Al Gore's movie "An Inconvenient Truth?" It demonstrates how truly dire the earth's situation is and how people tend to wait, like the frog in the increasingly hot water, because it is inconvenient, until it is too late. C314

The scientific debate is over. The evidence is overwhelming and growing with each new study: greenhouse gas production by humans is a major factor in the current global warming trend. This fact has sweeping implications for the health and welfare of citizens in the United States as a whole, as well as in Montana and even Great Falls in particular. No matter how seemingly insignificant an individual proposal is, it must be considered in the context of its contribution to this looming crisis. We have a moral obligation to all present and future generations to immediately change the dangerous course we are on. It is time to begin moving away from old fossil fuel technologies and toward renewable energy and an overall reduction in greenhouse gas production. Every step in the wrong direction exacerbates the problem, and every step in the right direction has a beneficial impact. C334

The proposed HGS is an unnecessary and ill-advised giant step BACKWARD! The DEIS fails to fully discuss and consider the direct, indirect and cumulative effects of a nearly 8% increase in Montana's total greenhouse gas production....RUS/DEQ/SME simply cannot dismiss the contribution of the proposed HGS to global warming as "impossible" to quantify. Using that rationale, there would be no reason for any single new power plant being designed anywhere in the US to turn away from technologies that contribute to global warming. C334

Response: The Montana and Federal Clean Air Act regulations do not currently regulate greenhouse gas emissions, including carbon dioxide (CO₂) emissions, from regulated sources of air pollution. Therefore, the DEQ does not have the authority to regulate these emissions under MAQP #3423-00 for the proposed SME-HGS project. Should a state law ever be passed to regulate greenhouse gasses, the Montana Board of Environmental Review has the authority to adopt appropriate rules and regulations.

On December 13, 2005 Governor Schweitzer issued a letter directing DEQ to establish a Climate Change Advisory Committee (CCAC), a broad based group of Montana citizens appointed by the Governor to develop a state climate action plan by July 2007. Under DEQ's direction, this initiative will examine state level greenhouse gas reduction (GHG) opportunities in all sectors in Montana, and take into consideration opportunities to "save money, conserve energy, and bolster the Montana economy." The Center for Climate Strategies (CCS) will work in partnership with DEQ to provide facilitation and technical support for the climate action planning process to meet these goals. The goals of this process include:

1) Development of a current and comprehensive inventory and forecast of GHG emissions in Montana from 1990 to 2020;

2) Development of a comprehensive set of individual policy recommendations to the Governor to reduce GHG emissions in Montana.

The CCAC process will seek (but not mandate) consensus on these findings and recommendations. Statewide GHG reduction goals, to the extent that they are developed, will be based on discussions with DEQ and this group.

2. *The likelihood of a federally imposed carbon tax on CFB plants in the near future is high, making this plant less economical. This is not addressed in the DEIS, and needs to be. C4, C20, C70, C77, C78, C80, C126, C164, C174, C294*

The Highwood plant poses other financial risks that have not been adequately considered (even though MEPA requires an evaluation of the economic costs of the proposed project, as mentioned on page 1-16). First, it is reasonably foreseeable that CO₂ will become a regulated pollutant. In its Fifth Regional Power Plan (released in 2005), the Northwest Power and Conservation Council estimated a 67% likelihood of a “carbon tax” being imposed in the near future that could be as high as \$30 per ton by the year 2016. (See Endnote #33) Closer to home, NorthWestern Energy assumed a figure of \$11 per ton as its “expected” tax in its latest default supply plan. (See Endnote #34) With 2.4 million tons of carbon dioxide emissions (and 3 million tons of CO₂ equivalent emissions), an \$11 per ton CO₂ tax would increase Highwood’s annual operating costs by more than \$25 million. C95, C134, C167

Considering this plant is projected to emit 2.3 tons of CO₂ each year, it's carbon tax of \$11 per ton were put on, as has been discussed, that would increase the annual operating costs of the Highwood station by more than 25 million. This represents the price increase to the consumer of more than \$11 per megawatt hour, significantly changing the economics of this plant. It is irresponsible for SME and the EIS not to consider this. C48

The governor of California ordered, last year, that the state reduce its greenhouse-gas emissions 25% by 2020. Its legislature may soon require existing companies to dramatically reduce their emissions. The costs for those companies will be large and some marginal operations may go out of business. If we start with a new power plant with out of date technology, what will its costs be when Montana or the federal government require them to reduce emissions? Will they go out of business as well? C64

At a minimum, the final EIS should take a hard look at the long-term environmental and economic consequences of greenhouse gases produced under the preferred alternative and an IGCC alternative, including the costs associated with sequestering carbon dioxide. We hear a lot about a future imposition of a “carbon tax” on energy production and this possibility should be factored into any analysis of long-term consequences of a coal generating plant. C317

Response: In the event a carbon tax or other GHG regulation is implemented, it is likely all owners of fossil fuel generation will be equally affected in that they will need to comply and costs of compliance will be increased across all fossil fuel forms

of generation. In addition, a new fossil-fueled power facility will have an advantage as it should have lower emissions for each unit of electricity produced. If a carbon tax is applied, there will be increased pressure on the federal power marketing agencies to “share” the benefits associated with BPA, WAPA, TVA and others with a broader segment of the population.

A carbon tax was not figured into the HGS project economics because such a tax does not currently exist, making any assumptions of amount and timing speculative. If a carbon tax were imposed in the future, it would likely apply to fossil fuels in general, including natural gas, oil, and diesel, resulting in economic impacts throughout society. Even the IGCC technology results in production of CO₂, and without an effective capture and sequestration technology -- which has not been demonstrated in conjunction with a power plant in the U.S. to date -- a carbon tax would affect the economics of an IGCC plant. Thus, it is incorrect to imply that a carbon tax will single out HGS, impacting only SME customers. Over 50 percent of the electrical generation in the US is coal-fired and Montana is at about 50 percent coal-fired generation. Since coal-fired generation is the main source of the US and Montana electrical generation system, any increased costs of generation, such as a carbon tax, will be passed along to all consumers of the electricity. The accompanying electricity markets are likely to respond with higher electricity prices because of the impacts on coal and natural gas as generation fuels. It is likely that any cost increases for HGS power associated with a carbon tax will be mirrored in the electric rates paid by all consumers, making the economic disparity argument a wash.

3. *The news media have gone full circle in concerns about climate change. We've gone to where we were talking about global warming in the 1930s, we talked about the ice age in 1970, and now we're talking about global warming again. I think the idea of global warming is cyclical as the climate changes itself. And I don't believe that man has that much influence in global warming. Climate change is inevitable. C6*

The noted science writer Michael Crichton in his book State of Fear, which is a highly footnoted and referenced book, talks about global warming and the media's role in overemphasizing and creating fear over this to help sell magazines. It talks well about the temperature changes and the rises. Not only are we experiencing increase in temperature changes in some areas, but we're also seeing decreasing temperature changes. It's a cycle. C6

I feel that global warming is a fact of life. We've been global warming since the ice age. C103, C134

Global warming is a natural cycle of the sun/earth. C211

All this earth warming being waved in opposition to advancement of Montana gets old....The “NO” wavers scream “EARTH WARMING.” Ms. Johnson, what you are seeing has existed since the beginning of time. Some 16 million years ago this areas was

plastered with Dinosaurs, a reported tropical, warm blooded creature. Those disappeared and this area, now known as Montana, was plastered with ICE. That melted and now this areas is plastered with wheat fields. C260

Response: As noted in the EIS, the preponderance of scientific evidence and opinion over the last two decades is that human activity, in releasing greenhouse gases, is indeed causing the climate to warm. This has been documented in numerous reports, studies and reviews. Best-selling author Michael Crichton is a science fiction writer, not a climatologist.

4. *The DEIS does not adequately consider the causes and effects of global warming, along with current and pending regulation of CO2 emissions. Because a CFB plant emits CO2, its impact can be lessened or avoided either with an IGCC plant or with alternate clean energy sources. There is NO GOOD REASON to build a CFB plant when we have such an abundance of appropriate technology and the natural resources to utilize them such as an abundance of wind and sun!!! C8*

Given current evidence of global warming, any permitting agency willing to permit the proposed action at the minimum requirements for permit regulations is working contradictory to public need and well being. C25

The global warming issue should make it critical to look for alternatives to coal. Why would we go with a known contributor to global warming when there are alternatives. Its been said that we have perhaps ten years to turn a corner before we reach a point of no return on global warming. What is the reason we don't go with hydro-electric or wind power? C33

Global warming will force individual energy consumers to cut back on their energy consumption. This will change our lives. When it gets really hot, and the global warming makes it even hotter, the air conditioning is going to make it -- there's going to be more demand for air conditioning. That's going to, in turn, contribute more to the problem of global warming. So to me it doesn't make sense to use coal fossil fuels to meet our energy needs. And the cost of this is actually going to be more from the standpoint of the energy consumer. C66

There is not much we can do about the old generating plants that were built with no regard for pollution and green house gas production. But we can and must do the very best we can now. We must produce electricity in the cleanest possible way. To do anything less would be unconscionable. C88

When it comes to greenhouse gases, the proposed "circulating fluidized bed" (CFB) combustion method is the worst available technology. CFB plants not only have all of the carbon emissions of a traditional pulverized coal plant, but also produce significant emissions of nitrous oxide (a greenhouse gas approximately 300 times more harmful than carbon-dioxide, on a molecule-to-molecule basis). C95, C134

By ignoring carbon risk, SME unfairly biases its analysis in favor of a specific coal technology with extremely high greenhouse gas emissions. If carbon costs were considered, other technologies such as IGCC, natural gas-fired combustion turbines, or a combination of energy efficiency and clean renewable energy sources would likely emerge as more cost-effective options. C95, C134

Overall, any new coal-fired generator is not a good idea. No matter how advanced it might be, it would add pollutants in the form of CO₂ greenhouse gases to the atmosphere, which will make global warming worse. C122

Response: SME-HGS proposed a coal-fired power plant incorporating a CFB Boiler for the production of steam to be routed to a steam turbine, which in turn drives an electric generator capable of producing electrical power. The EPA NSR Manual, which provides guidance on the BACT analysis and determination process for major sources of air pollution, states that, “historically, EPA has not considered the BACT requirement a means to re-define the design of the source when considering available control technologies.” However, the NSR Manual goes on to indicate “...this is an aspect of the New Source Review – Prevention of Significant Deterioration permitting process in which states have the discretion to engage in a broader analysis if they so desire.”

Further, a recent EPA policy/guidance statement titled *Best Available Control Technology Requirements for Coal-Fired Power Plants*, authored by Stephen D. Page, Director, EPA Office of Air Quality, Planning, and Standards (December 13, 2005), provides that inclusion of technologies such as integrated gasification combined cycle (IGCC) in the BACT analysis for a coal-fired power plant, such as that proposed in this case, constitutes re-definition of the source and is not appropriate under the BACT analysis and determination process. EPA has recently indicated that the policy described in this memo does not constitute the EPA’s final action on this issue but does constitute EPA policy.

Based on Department analysis of the proposed project, the Department determined that redefining the source from a CFB project to an IGCC project is not appropriate, in this case. For a more detailed analysis of IGCC, including an analysis of technical, environmental, and economic impacts, associated with the use of IGCC for the SME-HGS project, see Section III, BACT Determination, of the permit analysis to the Supplemental Preliminary Determination on MAQP #3423-00 included as *Attachment I, DEQ Supplementary Preliminary Determination on Air Quality Permit for HGS*, of the DEIS.

The Department understands that the carbon sequestration (greenhouse gas reduction) capabilities of the IGCC technology potentially represents a significant environmental benefit associated with the application of this technology when compared to historically prevalent coal-fired power plant projects (CFB and PC). However, greenhouse gasses, such as carbon dioxide (CO₂), are not currently regulated under Montana or Federal Clean Air Act regulations.

5. *The generally fair treatment of this subject of climate change in the DEIS reaches no conclusion on the subject of the proposed HGS. It does state that "...climate change is the ultimate global issue..." but does not go one step beyond that to the only conclusion- that to stop its progress we must each do our part to reduce GHG emissions. It is irresponsible and may one day be viewed as criminal that a new coal plant such as this be built when we know better. C10*

In the unknown scenario of the degradation of life on this planet by the agency of global climate change, for example, we can expect few major catastrophic events like the flooding of New Orleans last year. We can look for tiny, incremental and unnoticeable fluctuations tending in a certain direction over the years. We can expect a death of a thousand cuts rather than a single catastrophe, in much the same way that each coal fired power plant deals another blow to the habitability of this planet. C10

SME admits that global warming is a serious problem, but the draft DEIS doesn't address what they're going to do about it. They dismiss it as something that they don't need to deal with. C84

Carbon dioxide is becoming a very real concern to our environment. Global warming is occurring and this EIS needs to consider the consequences in more depth than the cursory comments given in the Global Warming section. The amount of carbon dioxide created by this plant is huge. Governor Schweitzer has taken many flights over the glaciers in Glacier Park to show people how global warming is affecting the glaciers. C104

Global warming is a huge issue. The EIS should state the impact in terms of specifics, not percentages of global pollution. The language should state equivalent numbers of car emissions, for example. How is this plant going to add to the melting of Glaciers in the Park and adversely affect tourism? How is it going to affect the drought and flooding issues? C105

Response: The EIS and agencies acknowledge that climate change is a long-term issue with profound implications for Montana, the biosphere, and human civilization. Neither agency has the authority under current regulations to regulate GHG emissions. The level of detail in the discussion of greenhouse gases and climate change it is appropriate for this EIS.

6. *SME asserts that for CO2 mitigation one newly planted tree will remove 1,600 lbs. of CO2 per year, which is impossible. C14. C20*

What are the actual costs and type of trees that can 'absorb' 1,602 pounds of CO2 and when will SME have the plan for urban reforestation, since scientists are now realizing that our forests are becoming more of an issue concerning CO2 just as much as the Amazon Rain Forest? C80

It is clear from the DEIS that the Highwood developers currently have no concrete plan to mitigate their carbon emissions. On page 4-55, there is a vague suggestion that trees might be planted to “sequester” some of the carbon. But the accompanying statistic, that a single tree can absorb 0.82 tons of carbon dioxide each year, greatly overstates the case. A tree in the tropics may sequester that amount of CO₂ over a 40 year lifetime, but trees in the Rocky Mountain West would be far less effective (especially if climate change results in continued drought-like conditions in a region already considered semi-arid). C95, C134, C164

Using the 2.4 million tons of carbon dioxide annually produced by the proposed HGS and some figures from the Tree Tech Corporation on sequestration of carbon, one would need a plot 18.6 by 18.6 miles square. So the DEIS, SME is correct in reporting there's not enough arable land on earth to fully offset global carbon emissions. C84

Response: The subject text should have read: “One tree is estimated to offset approximately 0.82 ton of CO₂...” and has been changed accordingly in the FEIS.

7. *This plant proposes to raise Montana’s carbon footprint by 7.5%, or the equivalent of 350,000-500,000 more cars. Stupidity is too kind of an expression. Any EIS which fails to consider global warming is irrelevant and flawed. C30, C84, C95, C134, C298*

You brought up the idea that the HGS is only going to be .03 percent of the carbon produced by this country. Now, it also says in the EIS that that is three million tons of carbon dioxide a year. That is equivalent to what 380,000 cars, probably half of the cars in Montana, I don't know the correct number, but I suppose it's about that. But that's not in the statement. All that's in the statement is that it's just .03 percent or it's .008 percent of the amount produced by the earth. That's like me saying, well, if I go out and shoot somebody on the street, out of the 24,000 murders in the United States, that's .0001 percent. So that doesn't matter, does it? It does matter. That's what is wrong with this statement. I assumed that it had been written by the industry when I read it, the total one-sidedness of the whole thing. The flavor of it. Out of the 700 pages of this instrument, three pages are what cover carbon dioxide and the effect of global warming. This statement should be at least 200 pages going into the impact, the environmental impact of what this plant is going to do to my children's future. C138

Response: The EIS does consider global warming; however, neither the federal nor the state agencies have the authority at this time under current regulations to regulate carbon dioxide emissions.

8. *The DEIS indicates that the potential facility-wide CO₂ emission rate of the HGS is 2,382,985 tons per year, and in addition, would release methane and nitrous oxide with an additional carbon equivalents emission rate of 669,096 tons/year. Should the reference be changed to “carbon dioxide equivalents emission rate?” Further explanation of the term “carbon equivalents emission rate” would be appreciated. C36*

Response: The appropriate characterization of methane and nitrous oxide emissions is “carbon dioxide equivalent” rather than “carbon equivalent”.

9. *The DEIS states that SME and the City of Great Falls are exploring various means of offsetting carbon emissions from the HGS and SME’s overall energy portfolio (page 4-54). We would appreciate clarification about the specific measures that SME and the City of Great Falls are exploring for offsetting carbon emissions, including research into potential advances in carbon sequestration and mitigation technology for future consideration at the HGS. C36*

What has SME and ECP done to understand and contribute to Governor Schweitzer’s efforts to seriously reduce greenhouse gas emissions and promote locally established renewable energy opportunities? C80

Response: SME is working on their plans for GHG mitigation which will be provided under separate cover.

10. *Do we ever look at countries bigger than us and what they're doing? Everyone that goes and buys red, sleeveless shirts at Wal-Mart are contributing to global warming and child labor. We have no sight, no picture of that until you get over in these countries and see what they're doing. C65*

The analysis in this EIS does not look at the increase in carbon dioxide from fires. It needs to account for the tons of carbon dioxide that were added to the atmosphere by the fires that burned over 613,000 acres in Montana so far this year. There were many additional tons of carbon dioxide added by the fires throughout the United States this summer. When discussing global warming, we must take into account the cumulative effects of power plants around the world, such as China and other developing countries. C104

We have heard the argument that China and India are building dirty plants also so why shouldn’t we do the same. But we should be leading the world in cutting back on CO2 emissions and refuse trade with those that don’t follow. C125

Response: Thank you for your comments. The EIS does discuss global and non-fossil fuel sources of greenhouse gases that affect the climate.

11. *How can the USDA consider funding a coal plant that directly contributes to GHG, which in turn contributes to climate change which has directly impacted farmers suffering in severe droughts, and helping farmers is what the USDA is about isn’t it? C80*

Response: RUS has no authority to regulate GHG emissions, however, the EIS does analyze the impacts of GHG emissions.

12. *The DEIS states that some scientists dissent from the majority view of the importance of carbon dioxide by global warming. What isn't mentioned and what was mentioned previously is that in the last ten years or so not even one peer-reviewed article by scientists who believe that global warming is not a serious problem have ever appeared in peer-reviewed journals. The dissents that are out there are usually in the form of reports, since the science that is used is usually fraudulent and is supported by big energy companies looking at their own needs. C84*

Response: Thank you for your comment.

13. *The DEIS also suggests that the 20 megawatts of hydroelectric power that SME currently purchases from the Western Area Power Administration (WAPA) might somehow count as a carbon offset credit against Highwood's emissions. But it is entirely inappropriate to try to claim credit for an existing long-term contract. Groups like the National Carbon Offset Coalition and The Climate Trust emphasize the principle of "additionality" -- i.e., that carbon credits should only be awarded to new projects that move us away from the "business as usual" path. C95, C134*

Response: Thank you for your comment.

14. *Time magazine warns that 2000 scientists in 100 countries reported to the United Nations and governmental panel on climate change. They conclude that burning fossil fuels is indeed the cause of significant changes in the earth's climate that has been corroborated by the American Academy for Advancement of Science, American Metrological Society, and the National Academy of Sciences. There is a definite fact that we are increasing or accelerating global warming by man-made CO2. C125*

Response: Thank you for your comment.

15. *Page ES-9, first paragraph, last sentence and page ES-12, second paragraph. The statement "...which most scientists..." is not supported in the text of the DEIS. SME suggests dropping the word most unless the references in the DEIS support this position. C128*

Response: This change has been made.

16. *Page 3-46, Section 3.3.6, bullets at bottom of the page. Some of the references in the bullets describing potential greenhouse gas impacts (i.e., ABC News, NWF, etc.) are secondary sources, and may not be reliable for a true scientific perspective on the issue. SME recommends that credible governmental sources be used to project greenhouse gas impacts. C128*

Response: These bullet points list concerns about "potential impacts" in the state by reputable, mainstream, if not always scientific, commentators and organizations. It does not purport to be a list of definitive predictions.

17. Pages 4-54, 4-55, Sequestration, Mitigation and Carbon Offsets. The various actions that SME has offered to mitigate green house gases should be presented in tons per year (suggest a table of measures and tons per year greenhouse gas offset). C128

Response: SME is working on this list and will provide under separate cover.

18. Montana has been contributing enough to the green house has problem via forest and range fires, without intentionally adding to the problem through coal fired energy plants. Citizen activists have said this plant would add the equivalent of 500,000 automobiles; how can than not be a significant impact. Even though it may be inconvenient to scuttle this project now, it may be essential to our life on earth to do so for this and all other such plants. C314

Response: Section 4.5.2.2.5 of the DEIS indicates that HGS emissions “would represent a very small but tangible, incremental contribution to this cumulative global issue,” which is without a doubt a significant one.

AIR-604 AIR QUALITY – VISIBILITY IMPAIRMENT

1. *Visibility toward Glacier National Park will be compromised. Current and proposed wilderness: Bob Marshall, Scapegoat, Little Belts, and Highwood areas will be adversely affected. C8*

The coal plant will have an adverse visual effect on the quality of air for many miles, including the Gates of the Mountains Wilderness Area and the Ulm Pishkun Buffalo Jump. It will diminish the view of the Highwood, Little Belt, and Rocky Mountain ranges. C20

Great Falls' indisputably crystal clear air would be at risk. I think Great Falls is being viewed as a throw-away community. We are viewed as not particularly picturesque and not going through a major growth spurt. We shouldn't have to sacrifice our community for the convenience of another. C33

Areas in the little Belts (particularly Pilgrim Creek, middle fork of the Judith) which may be considered for wilderness designation are not considered in the DEIS. Furthermore, the impact on the visual air as seen from the Rocky Mountain Front (when viewed from the Bob Marshall Wilderness or the Scapegoat Wilderness) at the top of the mountains looking towards Great Falls which are more than 33 miles may still show the pollution of the plant visually. The DEIS should consider the effect of the proposed plant on the view shed of the Rocky Mountain Front. C78

Why does the federal government and state of Montana appear willing to 'lower our standards' and diminish Montana's trademark 'Big Sky' (and clean sky) reputation, all for one coal plant while we have wind energy potential up to 116,000 MW? C80

I have real concern about the environment. Also I have a picture that my grandfather took of Havre Station 100 years ago. He was a photographer a hundred years ago in Montana, north central Montana here. The sky was blue. The sky was beautiful blue. Driving here today, there was a bit of smoke in the air. Often though we know what it's like when it's beautiful blue and the stars are so crisp. C99

This EIS says that there will be potential to significant impact, possibly minor or moderate degeneration in the visibility, in the quality of the air. Let's not give up what we have now. I'm a retired teacher. I taught for 30 years in Billings, and I chose to move back to my hometown of Great Falls where it is blue sky, because I tell you Billings is not. C99

A new coal plant in the Great Falls area would contribute to hazy skies and poorer viewshed. C122

We have such beautiful skies. I want to be able to see these skies, not something black and ugly. C190

Smog has come to Montana. Thirty years ago, the skies were clear just about all year long. Now, there are many days when haze on the horizon obscures the Front Range from my home in Choteau. This increased haze is in large part related to the increased number of coal-fired power plants in the intermountain west. The proposed Highwood plant will definitely worsen this problem. If new technology will clean up the burning of coal in this power plant, why build a smoke stack? The problem is that the combustion of coal at Highwood will not be clean and our skies will become dirtier with the building of this power plant. C248

I live on Holter Lake and I'm concerned about the Gates of the Mountains wilderness area....The regional haze, visual plume and acid rain "will" affect the Gates area, which is protected as Class I visual resources....I would hope that "if" the power station needs to be built that the State of Montana will insist that the new plant be a "State of the Art" coal powered station. C289, C290

Response: DEQ's authority is to evaluate visibility impacts at federal mandatory Class I areas, including Glacier National Park and the Bob Marshall, Scapegoat, Gates of the Mountains and UL Bend Wilderness Areas. Based on visibility modeling analyses performed and reviewed by DEQ, DEQ had concluded that moderate visibility impairment would occur at these Class I areas during periods of limited visitor use. The areas mentioned in the comments above are Class II areas and not subject to the stringent visibility requirements and analyses of Class I areas, which are all Congressionally-designated wilderness areas and national parks.

2. *Table 4-11 (page 4-49) shows the results of the refined visibility analysis. These results suggest potential days of direct project impact greater than 0.5 deciview in some Class I areas. These include three days at the Bob Marshall Wilderness Area, two days at the Gates of the Mountains Wilderness Area, and one day at the Scapegoat Wilderness Area. Visibility impairment of 0.5 deciview is the "level of concern" (LOC) threshold adopted by the U.S. Forest Service and is the threshold for defining a contribution to visibility impairment established in EPA's Best Available Retrofit Technology guideline. Consequently, the refined visibility results signify a potential environmental concern. SME should develop alternative/additional engineering designs to reduce these impacts. Could the use of an advanced coal combustion technology such as Integrated Gasification Combined Cycle Coal Combustion Technology (IGCC) be applicable in reducing visibility impacts? C36*

Response: The primary contributor to visibility impairment is SO₂. IGCC technology would not necessarily have lower SO₂ emissions and would therefore not be expected to reduce visibility impacts.

3. *Page 4-46, PSD Class I Increment Impacts Section. SME suggests a summary table of Class I increment impacts would benefit the reader (can paste out of Preliminary Determination in Appendix I). C128*

Page 4-47, Acid Deposition Impacts Section. SME suggests a summary table of acid

deposition impacts would benefit the reader (can paste out of Preliminary Determination in Appendix I). C128

Response: DEQ has included these tables and information in the permit analysis to the Supplemental PD on MAQP #3423-00, which is included as Appendix I to the FEIS.

4. *Page 4-49, second paragraph, Clarify that no modeled visibility impacts from HGS, by itself, were above 10%. C128*

Response: DEQ does not agree with the suggested change it is already stated in the paragraph above Table 4-11. To restate it would be redundant. Analyses using the 2000 FLAG-recommended method showed a few results over 10%. The proposed revisions to the FLAG guideline modify the recommended method, but have not yet been adopted.

5. *Page 4-49, third and fourth paragraphs. In summary paragraphs below Table 4.11, insert DEQ's position of no adverse impacts on visibility (see summary paragraph below Table 7 in Preliminary Determination in Appendix I). C128*

Page 4-50, Summary of Class I Area Impact Analysis. The term "adverse" in this paragraph could lead to confusion that it equates to an "adverse impact" to a Class I area as defined by the FLMs. Please differentiate between terms. C128

Response: The ARMB believes that the text, as written, is accurate and complete and addresses all visibility issues and concerns. The reader seeking more information can read the air quality Permit Analysis.

The adverse effect noted on these pages is determined by the MEPA and NEPA significance criteria in Appendix J, which are different than the criteria for issuing a permit. The impact is not significant, but there would be an impact, which is not beneficial; therefore, it must be adverse. A discussion with ARMB indicates that 'adverse' in the PD addresses DEQ's specific legal obligation under ARM 17.8.1101 et seq.

BIO-700 BIOLOGICAL RESOURCES

1. *The environmental effects of particle fall-out to the nearby Benton Lake Wildlife Refuge are not addressed in the DEIS. The public has not been advised on this concern, so public input has been denied (as has been the case for a number of other citizen concerns regarding SME's proposals). C8, C165*

Recent reports indicate that songbirds may be adversely affected by mercury poisoning. The coal plant is in close proximity to Benton Lake Bird Refuge. Mercury is especially toxic to those birds that eat fish like bald eagles. The draft EIS greatly downplays this risk; area bald eagles are already dying from mercury poisoning. The National Audubon Society has not been given adequate time to weigh in on this process. C20, C165

On February 4h of this year four bald eagles were found in Fort Benton, Choteau, Roscoe and Hauser Lake. Two were dead, one improved after treatment, and one is in rehab. According to Dr. Allen Armodus (phonetic), MSU's Department of Ecology, all were impacted by mercury poisoning. Montana Fish, Wildlife & Parks has studied loons in the upper Flathead Valley and has found high levels of mercury in the loon population, especially the eggs. As you can see, birds in the local area are already being affected by mercury poisoning. We don't need more. Our close proximity to the Missouri River, where many birds feed on fish, and Benton Lake National wildlife refuge tracking migratory waterfowl make this proposed siting especially harmful to fish and wild birds. C102

The majority of Montana waters already have unacceptable levels of mercury in their fish populations. Cut throat trout, especially in the Highwood and Little Belt Mountains, will be threatened by mercury emissions from this plant. Since the Missouri River is ultimately a predominate recipient of emissions, the pallid sturgeon downstream are also at risk. C9

Response: Benton Lake Bird Refuge and the Flathead Valley are not located within the primary downwind dispersal zone of the HGS, so this plant's mercury emissions would be unlikely to contribute to the cumulative mercury burden these areas may already have. Concerning mercury contamination in Montana's fish, the State has issued consumption advisories on about 30 water bodies, all but two of which are lakes or reservoirs. The Missouri River near Great Falls is not one of them.

Overall, the plant's emissions would occur in a context in which power plant mercury emissions in the state will decrease by about three-quarters over the next 15 years or so, due to imposition of the federal and state mercury rules; national coal-fired power plant mercury emissions will be declining comparably. However, as noted in Section 3.3.5 of the EIS, most mercury deposition in the Western United States is believed to originate from emissions outside of North America. Thus, rates of deposition and accumulation of mercury in the American environment, and its potential adverse consequences for fish and wildlife, are still difficult to predict and control.

2. *Though the possibility of bird and bat mortality is discussed at length in the text, no research or projections are provided regarding the ability of these species to adapt to avoid collisions with the driving blades. Such adaptation is the driving force of natural selection and can be anticipated from animals of higher intelligence such as these. C10*

Response: Adaptation through natural selection and evolution takes many, many generations and thousands or millions of years. It would not be a factor in lowering any mortality from collisions at this or other wind farms in the immediate future.

3. *The clearing of trees may potentially occur for this project, but the DEIS does not specifically discuss tree restoration. We recommend replacement trees be planted to offset any unavoidable tree loss. We generally recommend that native saplings be used, if practicable, at a minimum ratio of 1:1. We understand that trees cannot be replaced directly in a pipeline corridor, for access to, and protecting the integrity of, the pipeline. However, in general the replacement trees should be planted close to where the loss occurred as possible. Alternately, mitigation might also include assisting county, state, or federal agencies with any on-going or planned forest or tree reclamation projects in the watersheds affected. We recommend commitment to voluntary tree mitigation, if applicable, in the EIS and to providing, as detailed as possible, a conceptual mitigation plan that compensates for any unavoidable tree loss. C36*

Response: It appears unlikely that any trees at all would be removed by the construction of the HGS or any of the associated pipeline and transmission line corridors that would connect the plant. If any trees were to be removed, SME has committed to planting native saplings at a minimum of a 1:1 ratio within or near the project boundary.

4. *We are pleased that a Noxious Weed Management Plan would be prepared and submitted to the local Weed Management District (page 4-61). Studies show that new roads and pipeline/utility ROWs can become a pathway for the spread of invasive plants. We suggest that the plan address control of weeds along the disturbed construction ROW, and any new roads, by implementing yearly review and planning activity requirements for this concern. This would include evaluation of effectiveness to date. The Plan should address all areas where ground disturbances will occur including the power plant, roads, pipelines, transmission lines, underground cables, railroad lines, wind turbines, etc.,. The plan should address such techniques as washing/cleaning equipment before entering more sensitive areas to help prevent importation of seeds, etc. Also, the current trend for weed infestations in the affected project area should be evaluated for mitigation effectiveness and improvements if warranted. C36*

Response: The techniques suggested are being considered and evaluated in the Noxious Weed Management Plan under preparation. An outline of this plan has been included in the FEIS.

5. *We did not see a specific commitment to implement Montana Bald Eagle Management*

Plan guidelines or other bald eagle protective actions that may be identified by the Montana Dept. of Fish, Wildlife & Parks and U.S. Fish & Wildlife Service (USFWS). We recommend that a commitment be provided in the FEIS to implement needed conservation measures and precautions for bald eagle protection after full consultation with the USFWS. The consultation should also include the inclusion of the USFWS Biological Opinion on the Biological Assessment in the FEIS. C36

Response: The Biological Assessment and the Biological Opinion, containing any required mitigation measures to protect bald eagles, is included as an appendix to the FEIS. Any required mitigation measures would be included in the ROD as well. SME has committed to implementing industry-standard practices for bald eagle and other raptor protection.

6. *Page 4-58, first paragraph, last sentence: “Vegetation can be directly affected by its removal as the ground surface on which it occurs is developed, or indirectly through changing populations of wildlife that feed on plants. (emphasis added). This latter statement is extremely unlikely to occur in the HGS project area. C128*

Response: This is a general opening statement in the section on biological resources impacts, and is refined throughout the section as it proceeds. We agree that the likelihood of vegetation effects at the power plant site itself is highly unlikely, but the various proposed corridors do cross areas containing native vegetation.

7. *Page 4-59, second paragraph, sixth line. Add a comment that the current transmission line route is not close to the nesting site near the confluence of Belt Creek and the Missouri River. C128*

Response: A statement to this effect has been added to the FEIS.

8. *Page 4-63, first paragraph, third sentence: “Trenching may disturb **sensitive** (added emphasis) shrub and tree habitats concentrated in the coulee. Upgrading the existing vehicle trail in the coulee could also impact **sensitive** habitats. **Song birds and raptors, small mammals and reptiles concentrate in these areas, especially during spring breeding season.**” There was no evidence or discussion in Chapter 3 that the shrub and tree habitats, or other habitats in the coulees, were sensitive, either from a biological or legal (e.g., species of concern) viewpoint. Important or potentially important for wildlife, yes; sensitive, no. In addition, there is no evidence that wildlife species groups such as songbirds, small mammals or reptiles concentrate in these areas during breeding season, or any other season. If this Comment is accepted, we suggest that the significance of these potential impacts be reconsidered. C128*

Response: The cited language has been changed to reflect these suggestions. In the context of biological surveys for environmental assessments, the word “sensitive” typically implies the presence of rare or listed (endangered, threatened, species of concern) plant or animals species, which are not known to occur in this instance.

9. *Page 4-63, second paragraph, last full line. Deleted the word “be” as noted “...fish would not be harmed...”. C128*

Response: This correction has been made.

10. *Page 4-63, third paragraph, last line. Add a sentence that clarifies the preferred method of disposal is to return HGS wastewater to the City of Great Falls where it is subject to pretreatment standards, and not water quality standards or limits applicable to discharges to the Missouri River. C128*

Response: This change has been made.

11. *Page 4-66, paragraph 3, first sentence and Appendix J: SME questions the significance criteria for aquatic and terrestrial biological resources degradation, but agrees with those for invasive plants. For aquatic and terrestrial resources, we disagree with the definition of “short-term: less than one month.” It is quite probable that many construction-related activities will not be completed within one month, making it virtually impossible to have an actual “short-term” impact. We recommend wording such as “one full season following completion of construction,” which provides time for wildlife to recover/reoccupy from construction-related impacts. The significance criteria, as presented, push virtually all impacts into “long-term” (which we would define as “longer than three years”) and “moderate” (depending on how one defines the words “decline” or “degradation”). C128*

Response: The definitions of short-term, medium-term and long-term impacts for biological impacts have been revised accordingly.

12. *Page 4-67, Section 4.6.5 Mitigation. Please note that several of the mitigation measures imply that no activity should take place until after “the spring nesting season.” Depending on the species, the spring nesting season may well extend into mid-July or even early August. Depending on SME’s construction schedule, this could mean the loss of several months of good construction weather. Our recommendations by sub-section:*

Threatened and Endangered Species: Okay as is.

*State Species of Concern: We suggest the following changes to this paragraph (in boldface): “Avoiding **or minimizing** disturbance of shrub, tree and wetland habitats would reduce adverse effects on raptors and breeding bird species by the proposed project. If these habitats must be removed, disturbed or altered for construction or maintenance of the proposed project or infrastructure, **a pre-construction reconnaissance could be conducted to determine, to the extent practicable, the relative importance of such habitats to state species of concern. Disturbance of any such sites/habitats of importance to these species groups could be mitigated through the use of reasonable timing constraints during construction, reclamation/restoration of disturbed sites, or other appropriate measures.**”*

Power Lines: We suggest adding (in boldface): “SME and its contractors should follow the “Suggested Practices for Raptor Protection of Power Lines”, Edison Electric Institute (EEI, 1996) **or other appropriate guidance or recommendations for proper techniques.**” Assuming that transmission lines will be built by the local cooperative or some other entity other than SME directly, we should not limit them to methods that they might not customarily use.

Aquatic Resources: We suggest revising to: “Since the Morony Reservoir is being used by MFWP to rear sauger, a state species of concern, **SME will consult with MFWP on methods to minimize the impact of construction and maintenance of the raw water intake on sauger.**”

Wind Turbines: We suggest changing the last bullet to “Follow USFWS guidance (USFWS, 2003) and protocols **to monitor bird and bat mortalities. If after three years, monitoring demonstrates that bird and bat mortalities are not substantial, monitoring may be ended or modified in consultation with the appropriate regulatory agencies.**”

Carrion Removal from Railroad Spur and Access Roads: The mitigation measure “SME would remove carrion resulting from larger mammals and lizards (e.g. snakes) killed by rail or road traffic to a site well-removed from the turbines, to a distance of at least 0.5 mile (0.8 km) away” is not practical. We suggest deleting the entire paragraph and replacing with: “**SME will monitor all established roads, as well as the railroad, within 1.0 mile of the wind turbines a minimum of once per week, and will remove all carrion that are equal to or larger than a rabbit in size to a disposal site at least one mile from the turbines.**”

Noxious Weeds: no changes. C128

Response: These suggestions are incorporated into the FEIS. However, final details of all mitigation measures may be discussed and negotiated with agencies after issuance of the FEIS. The outcome of these negotiations and agreements would be reflected in the ROD.

13. Page 4-68, first paragraph under Aquatic Resources, third line. The preferred method of wastewater disposal is to return the wastewater to the City of Great Falls so there is no planned water outflow to the Morony Reservoir. C128

Response: This change has been made. The paragraph has been deleted since it no longer applies.

ACO-800 ACOUSTIC ENVIRONMENT

1. *The DEIS does not provide a comprehensive assessment of noise and safety, especially regarding the transportation of coal and other materials through urban areas. C8*

Response: The analysis of noise is adequate for an impact determination.

2. *Any degradation to natural ambient sounds (20-47 dBA) is considered an adverse impact for areas administered by the NPS. Although the noise levels at the staging area interpretive site are predicted to be near the 55 dBA daytime standard for residential areas, the impact of the soundscape degradation should be considered from all points of the NHL. Areas near the project site are expected to routinely exceed these standards. In addition, the noise levels were based on routine operation of the generation plant without the added, although intermittent, contribution from railroad (65 to 90 dBA) and trucking operations serving the plant. This unavoidable adverse impact to the acoustic environment (Pg. 4-133) is considered of major significance under NPS policy. C28*

Response: Thank you for this additional information related to impacts of increased noise levels within the NHL. The overall impact determination for noise has been modified accordingly, from adverse and non-significant to adverse and significant. This change is reflected in the FEIS.

3. *I object to the increased noise being termed insignificant or within municipal codes. We enjoy a very quiet environment now. We are a rural area and municipal noise codes are not relevant to our situation. C45*

Response: Please refer to the response above. Noise impacts at the Salem site have been re-evaluated and determined to be significant. This significance determination will become part of the overall decision for the HGS. In addition, Great Falls' municipal code (noise ordinance) would apply to either the Salem or Industrial Park site if it was annexed to the city.

4. *Where does the DEIS specifically state the actual noise decibel levels for the plant at either site? C80*

Response: The DEIS specifically states the actual noise decibel levels for both plant sites in Sections 4.7.2 and 4.7.3.

5. *Where is data showing the more 'silent' nature of wind turbines, which do make some noise, but hardly that of an old coal plant, complete with railcar noise and industrial processes. C80*

Response: Noise was a major impact of an earlier generation of wind turbines. However, turbine design modifications appear to have reduced this problem, as discussed in Sections 2.1.3.1 and 4.7.2.

6. *Page 3-60, Section 3.5.1, last sentence: "Recommended land use and associated noise levels are illustrated . . ." should read ". . . and associated noise levels developed by HUD are illustrated . . ." since they are specifically HUD's recommendations. C128*

Response: This suggestion has been incorporated.

7. *Page 3-61, Section 3.5.1, Table 3-14: The title "Noise Levels (dBA)" should be clarified to read "Ldn Noise Levels (dBA)" since the values shown in the table are day-night average noise levels (Ldn), not some other noise metric. C128*

Response: This suggestion has been incorporated.

8. *pg 4-70, Chapter 4, Section 4.7, 4th paragraph, last sentence: The reference to "the criteria cited in Section 3-6-2 of this EIS" should be checked. Section 4.2.2 and Appendix J has the significance criteria used to determine impact ratings, and according to the Table of Contents, there is no Section 3-6-2. C128*

Response: Thank you for this correction.

REC-900 RECREATION

1. *Both Salem and Industrial sites will adversely impact Giant Springs State Park and its fish hatchery. C8*

The impact on the fish and fishing and tourism industry has not been accurately evaluated. Montana's reputation as "the last best place" will be further tarnished by fish advisories that further reduce levels of fish consumption due to mercury contamination. C20

You also talked in your presentation about cultural and visual effects. We are very close to Ulm Pishkun State Park. We have Freeze Out Lake Wildlife Management area of Montana. The EIS mentioned briefly migratory birds. We have 300,000 snow geese and 10,000 tundra swans gather there. That's 40 miles away. I know it's a little farther than the 30 miles you're concerned with. And Giant Springs State Park in Great Falls is another valuable place, fish hatchery, that would be affected by this. C68

As many Montanans and visitors appreciate, how can SME help preserve our clean vistas, fishing for 'healthy' fish and ability to enjoy these unique treasures? C80

I for one hunt and fish in the area it is a tradition. If the proposed plant goes through I won't be able to eat my fish and game. C292

Response: The EIS concludes that the HGS would have at most a minor impact on Great Falls' and Montana's valuable recreation areas and parks. Concerns about mercury effects on fish and wildlife are addressed in Sections 602 and 700 responses. The HGS should have little or no effect on the existing ability of hunters and anglers to consume their kills and catches. Where fish consumption advisories are now in place, these would remain in place. HGS mercury emissions are unlikely to lead to the need for any further advisories. Mercury contamination of herbivorous (plant-eating) game such as deer, elk and antelope is minimal at present and the HGS would not change this.

2. *How many visitors would a coal plant get versus other communities that have windmill and derive tourists from that, as that situation has been observed in Judith Gap? C80*

Response: The public tourism and visitation aspect of the HGS was not analyzed.

3. *Page 4-78, first paragraph under proposed action – HGS at the Salem Site, last line. Delete the last portion of the sentence which states "...while the latter offers fishing....". PPL Montana has closed Morony pool to public access. C128*

Page 4-79, first and third paragraph. Revise the portion of the sentence which states "...would not restrict access to either of these facilities...." to reflect a singular reference. Delete the third paragraph. The Morony pool is not open to public access. C128

Page 4-80, first paragraph, fourth and fifth line. Delete the last portion of the sentence which states "...and the Morony Reservoir...." Also revise the portion of the sentence in the fifth line to a singular reference. The Morony pool is not open to public access. C128

Response: These suggestions have been incorporated in the FEIS.

CUL-1000 CULTURAL RESOURCES

1. *The Salem site negatively impacts the Lewis and Clark Portage Route. C8, C58*

Response: In the EIS, DEQ and RUS concur with this opinion.

2. *Will the R.U.S. make available taxpayer dollars for this loan knowing they are harming Federal tax dollars already spent on the “National Historic” portage site of Lewis and Clark? How will this be handled by the Federal courts representing the National Trust for Historic Preservation, the United States Park Service and the State Historic Preservation Office? C14*

*In addition to the natural beauty of the landscape is a sense of pride in the history of our region. Another area of concern is the location of the coal plant within the Lewis and Clark National Historic Landmark, where it creates a class IV (of IV) visual and auditory eyesore that seriously detracts from the pristine nature of this historic area at the base of the scenic Highwood Mountains. There has not been adequate time allowed in this public comment process to alert Lewis and Clark supporters across the country and to seek their input. **Federal agencies should not be using federal tax dollars to jeopardize significant national resources such as historic landmarks.** This type of view shed will become increasingly valuable with increased population growth. C20*

How can the federal government, through the USDA RUS or DOE, even consider funding a project that compromises a ‘national treasure’ such as the Lewis and Clark portage route? C80

The location of the Highwood coal-fired generating plant on the Lewis and Clark portage route trail would forever ruin the area’s historic significance....Please help save this beautiful, tranquil Lewis & Clark Trail. C262

As stated in the draft EIS the proposed Salem site for the CFB plant is located within the Great Falls Portage NHL. The draft concludes that the NHL is highly significant and it would be adversely affected by the preferred alternative because the project would alter the setting of the historic site, a factor that contributes to its significance. Given that the historic property is nationally important, more consideration must be given to alternate locations for the proposed plant rather than simply seeking ways to mitigate impacts at the Salem site. C317

Response: RUS is conducting consultations under Section 106 of the National Historic Preservation Act with a number of consulting parties, including other Federal agencies, which have expressed concern about potential impacts to the NHL. These consultations are addressing the concerns and collaboratively formulating measures to avoid, minimize and mitigate the impacts where possible. All the consulting parties clearly recognize the investments, monetary and otherwise, that have been made in establishing and maintaining the integrity of the NHL. Under S. 106, any mitigation measures agreed upon by the consulting parties

are documented in a Memorandum of Agreement (MOA), which is signed by these parties. The consultation process is ongoing, and SME has been an active participant in the process.

3. *The executive summary and Chapter 2.2.2 state that the proposed Salem site is in "Section 36, Township 21 North, Range 5 East at about 3,354 (1,022 m) above sea level" (Pg. ES-5). However, all illustrations of the proposed coal-fired generation plant, transmission switchyard and rail terminus indicate the location is in Section 24, with the wind turbine array extending into Section 23. (Figs. 2-21, 2-22, 2-23, 2-29, 3-2, 3-9, 3-10, 3-12, 4-4, 4-10, and 4-11.) Further, the UTM coordinates provided in Chapter 4 (Pg. 4-37), and appearing throughout the Draft Air Permit, seem to be in error, although the elevation of 3,290 feet (MSL) conforms with Section 24. C28*

Response: Thank you for pointing out the need for this correction. The FEIS includes the correct coordinates. The HGS is proposed to be sited in Sections 24 and 25, Township 21 North, Range 5 East, M.P.M., Cascade County, Montana. Approximate UTM coordinates of the facility site (specifically the Unit 1 stack) are Zone 12, Easting 497.3 kilometers, and Northing 5,266.4 kilometers. Site elevation is approximately 3,310 feet above mean sea level. Moreover, the correct coordinates were published in numerous forums. For example, the November 30, 2005, Air Quality Permit Application accurately listed the coordinates (p. 1-7, and Fig. 1.2-1). Also, a February 3, 2006, article in the *Great Falls Tribune* indicated the correct location of the HGS and included a map of the location. Figure 2-23 in the DEIS from June 2006 depicted the correct coordinates for the HGS. As part of the mitigation for the Lewis and Clark Portage Route NHL, SME has agreed to move the HGS site off the NHL, which is reflected in the above location. A new map and coordinates have been provided for the alternate site layout.

4. *The National Park Service role as administrators of the National Historic Landmark program and the Lewis and Clark National Historic Trail is not addressed among the agencies with some responsibility over some aspect of the proposed action. As such, the Great Falls NHL is held to the protective environmental standards afforded to similar NPS areas. In particular, any degradation of air quality, soundscapes and night sky conditions are considered adverse effects on such areas. C28*

Was the federal National Park Service/USDA Forest Service contacted in regards to the potential compromise of the Great Falls Portage National Historic Landmark? C80

Although a cultural resources report by RTI was completed in 2005, media accounts described the undertaking as lying north of Great Falls in a wheat field. There was apparently no effort until late summer 2006 to inform the NPS National Historic Landmark program or interested parties that have been affiliated for years with Lewis & Clark Trail stewardship or the portage site itself of the degradation that this proposed power plant presents to the integrity of the Great Falls Portage NHL. C97

Response: The FEIS includes the fact that NPS administers both the NHL program and the Lewis and Clark National Historic Trail. However, NPS jurisdiction on private lands within NHLs differs from NPS jurisdiction on public lands within NHLs. RUS contacted the Department of the Interior (DOI), per DOI procedure, about the NHL prior to release of the DEIS. DOI was also notified of the two separate scoping meetings, in the fall of 2004 and spring of 2005. The U.S. Department of Interior (Fish and Wildlife Service) commented in writing following the fall 2004 scoping meeting. It is the responsibility of DOI to distribute such notices to its respective agencies.

5. *Views from the staging areas interpretive site, location 0.8 miles north of the proposed construction, were specifically addressed in the DEIS (Figs. 4-6 to 4-14). From this location, the view in the direction of travel for the Expedition (south-southwest) would be effectively obliterated by the coal-generation plant, 397-foot tall wind turbines and transmission line grid. Complete analysis would consider the views in all directions from any location within the NHL, not just the staging area. Even with the limited evaluation of impacts on the viewshed, the DEIS states the HGS would dominate the scene within the NHL (Pg. 4-87). C28*

Response: The significance determination for cultural and visual impacts would not change with this suggested additional visual analysis. The impacts would remain significant.

6. *The portage route used by the Corps of Discovery to transport all its gear and equipment around the Great Falls of the Missouri River lays to the south of the river, not north as stated here. Although the complete company did not return to this portage route, Lewis and a contingent of men passed on their return in July 1806, in part to retrieve a pirogue and other items cached at the mouth of Canoe Creek (now Belt Creek). At this time, Sgt. Ordway camped at willow Run (now Box Elder Creek) at a site that would be impacted by the construction of the fresh and waste water line to the HGS. C28*

Response: Thank you for this correction and additional information. As proposed, the fresh and waste water line to and from the HGS would be along the now abandoned Milwaukee rail line. Because of the previous disturbances in the area due to installation of a rail line (associated excavation, fill, compaction, placement of rail bed material, placement of rail ties and rail), the construction proposed should have minimal additional impact to the Box Elder Creek area.

7. *Another shortcoming is the inadequate analysis, or non-existence, of the impact of emissions and contaminated ground water upon the nearby the Lewis and Clark historic site and Portage Route. Since both city officials and SME employees maintain that much of the project is to be funded by federal funds and especially when a local governmental institution is a partner in this project, it would seem that a more thorough examination of the Highwood Generating Station's site and the site for the storage of ashes is needed. C29*

Response: The FEIS concludes that there would be no groundwater contamination from ash disposal at the HGS. It also concludes that air quality would not be degraded in the vicinity of the NHL. The HGS would have to comply with both an air quality permit and a solid waste license.

8. *Chapter I: introduction, p. 1-5, 1.2.5 Montana State Historic Preservation Office, (SHPO), states that “if approved, the lead agencies would oversee compliance with historic preservation and monitoring plans.” (Emphasis added). This statement seems to be put into the Draft EIS as an after thought. One can ask if the word “would” guarantees a loose-ended commitment after the plant has been built. C29*

Response: Mitigation measures to reduce cultural resources impacts are being developed; compliance with these measures would not be optional. The mitigation measures are included in the draft Memorandum of Agreement (MOA) attached to the FEIS as an appendix. RUS, under the authority of 36 CFR Part 800 and the MOA, will have the authority to enforce these measures.

9. *Where is the study of the historic integrity of its landscape? It is clear that the 1906 Antiquities Act and subsequent congressional legislation demand that such analysis is part of the Draft EIS. C29*

Response: A Cultural Resources Inventory was conducted as part of the EIS analysis, and a summary of the findings from this study is included in Section 3.7.

10. *The only potentially “significant” adverse impact identified in the DEIS would be on cultural and visual resources, because constructing the HGS at the Salem site would adversely affect the Great Falls Portage National Historic Landmark commemorating the 1805 portage the Lewis and Clark Expedition made around the Great Falls of the Missouri River (DEIS abstract). We recommend that additional information be provided in the FEIS regarding the creative designs and facility siting techniques that would be proposed to assure the preservation of the historic landmark and landscape view. C36*

Response: Section 106 consultation among RUS, DEQ, the SHPO, the Advisory Council on Historic Preservation (ACHP), and a number of consulting parties has taken place since publication of the DEIS. This consultation has addressed siting and design issues and is formalized in the draft MOA attached as an appendix to the FEIS.

11. *The Lewis and Clark portage route is presently located in mostly pristine areas. How will SME keep coal dust and contaminants from coating this area? C50*

Response: The portage route is better described as “open space” or “rural” rather than “pristine.” The air quality permit for the HGS would include conditions designed to protect the local landscape from air pollutants such as coal dust and other particulate matter.

12. The Board of Directors of the Lewis and Clark Interpretive Center Foundation, in cooperation with the Southern Montana Electric and Transmission Cooperative Highwood Generating Station, has discussed mitigation efforts at the proposed plant and reached agreement on priorities for such mitigation. Our understanding is that mitigation efforts would include the following:

- 1) Establish an educational endowment or provide an annual contribution to fund Lewis and Clark educational programs;*
- 2) Assist in preserving the Missouri River north bank, by helping to fund acquisition of the viewshed properties located directly across the Missouri River from the Lewis and Clark Interpretive Center; and,*
- 3) Assist in the remodel of the Lewis and Clark Interpretive Center, and William P. Sherman Library*

A fourth possibility, but of much lower importance, includes paving the road to the Portage site. C79

We support SME's efforts to mitigate the potential adverse visual effect on the registered Great Falls Portage National Historic Landmark. However, we believe there are other mitigation measures to be considered in addition to those listed....For example, one such mitigation measure to be included, but not be limited to, would be contributions to the Portage Route Chapter's Educational Endowment Fund for the Lewis and Clark scholars' programs. C177

The Great Falls/Cascade County Historic Preservation Advisory Committee (HPAC) has reviewed the DEIS and concurs in your finding of Adverse Effect on the significant qualities of the Great Falls Portage NHL....We strongly support economic development consistent with sound preservation principles, but found the proposed mitigation measures somewhat lacking in the ability to minimize the impacts on the NHL. C180

Following an August 22, 2006 tour of the proposed site with the property owners and SME general manager, Tim Gregori, we are more comfortable with the effects of proposed construction and we believe there is some potential to reduce adverse effects if the developer will commit to reasonable mitigation measures. We look forward to a continuing dialogue regarding those measures. C180

Response: These measures and others are under development as part of the Section 106 consultation process. Some of these measures are included in a draft MOA attached as an appendix to the FEIS.

13. How will electrical transmission and water lines be 'mitigated' as they physical[ly] cross directly through the portage route? C80

Response: Suggested measures to minimize these impacts are under discussion and review and are included in the MOA and will be included in the ROD. Examples of mitigations include use of the Corten monopoles (single poles rather than more

conspicuous lattices or H-frames) that would be used for power transmission and that would change color as they are exposed to the naturally-occurring climate to a dull, light rusty color that would blend into the viewscape. The land disturbed for the installation of the fresh water and wastewater pipelines would be restored to the original elevations, reclaimed and re-vegetated.

14. *In Section 3.7.3 it's stated that letters were sent to the eight organizations of the Montana Wyoming tribal leaders council informing them of the proposed action and EIS process. Unfortunately only two of those entities responded in any way. I'm wondering if cultural protocol had been followed to actually talk to individual members, such as our tribal elders or our spiritual leaders, those who might have something to say and to contribute and to educate the folks that are not part of the western scientific approach.* C119

Response: As required by the EIS process, RUS sent letters to the designated points of contact of the federally-recognized tribes in the state. The RUS Montana tribal coordinator followed up with phone calls to each tribe. At the request of RUS, SME conducted a site tour for representatives of the Blackfeet Tribe and USDA's tribal liaison in Montana.

15. *Page ES-10, second paragraph, next to last sentence. "...water supply and wastewater lines could potentially affect undiscovered cultural resources...." Add to this statement the fact that this would be a low probability as the lines are proposed to be installed in a previously excavated right of way where soil disturbance has occurred for a previously constructed railroad system.* C128

Response: The FEIS includes a statement to this effect.

16. *Page 4-82, last paragraph. We suggest that the statement in the last paragraph regarding the Great Falls Portage NHL's integrity being based "predominantly on the visual landscape qualities that are very similar to that which existed during the early 19th century when the Corps of Discovery traveled through the area" be revised as follows: "While portions of the visual landscape qualities of the Great Falls Portage NHL's may be similar to those which existed at the time of the Lewis and Clark expedition, many portions are not. Over much of the Site the visual landscape is quite changed, including damming of the great falls, development of the City of Great Falls, development of Malmstrom Air Force Base, development of numerous farmsteads and accompanying facilities, and installation of numerous transmission lines across the Missouri River." A good description of the present visual landscape is provided in an editorial in the Great Falls Tribune dated August 23, 2006. To quote the editorial:*

"The portage route the explorers took out of the bottoms near the mouth of Belt Creek basically cut the corner of the river's bend through Great Falls. The route is thought to have crossed southwesterly from Belt Creek toward the Missouri above the Great Falls. Among other things, it crosses what is now Malmstrom Air Force Base.

The site of the Corps of Discovery's camp in those Belt Creek bottoms is below the line of sight of just about anything but the opposite bank and some four-wheeler tracks.

It's only when you rise up to the benchland that you can see the mountains — and the power lines, the roads, the farmsteads, Malmstrom's coal-fired heat plant and, maybe someday, the stacks of the new power plant." C128

HGS at the Salem Site location would not be seen from many historically significant locations along the NHL including Belt Creek, nor would it be visible from the Lewis and Clark Interpretive Center. This point is obscured in the DEIS, which focuses heavily on the views from the Portage Staging Area Site, e.g. Figures 4-12 and 4-13, but does not provide similar figures of views from Belt Creek or the banks of the Missouri River adjacent to where the Corps of Discovery began its portage. We suggest including views from these other locations in order to provide a balanced discussion of this issue. Further, while some of the text at p. 4-88 in Section 4.10 makes this point that the Salem Site would not be visible from many historic areas of the NHL, the same statements should be incorporated into Section 4.9.

A final comment on this issue is that the description of mitigation measures in Sections 4.8.5 and 4.10.5 should be included in 4.9.5 since they relate directly to the visual impact of the Salem Site on the NHL. Their inclusion in these other sections, but not in 4.9.5, is confusing to the reader and results in mis-placement of the mitigation measures related to the impact of the Salem Site on cultural resources. Further, the DEIS should reflect that SME is working closely on mitigation with such local organizations concerned with the Portage NHL as The Lewis and Clark Interpretive Center and The Lewis & Clark Trail Heritage Foundation Inc., Portage Route Chapter. C128

Response: The first sentence in the last paragraph on p. 4-82 of the DEIS reads: "This NHL's integrity is based predominantly on the visual landscape qualities that are very similar to that which existed during the early 19th century when the Corps of Discovery traveled through the area." In the FEIS, the word 'very' before 'similar' has been deleted. Following this sentence, the sentences below have been added:

"While portions of the visual landscape qualities of the Great Falls Portage NHL are indeed similar to those which existed at the time of the Lewis and Clark expedition, other portions are not. In the vicinity of the NHL the visual landscape is quite changed, including damming of the Great Falls of the Missouri, development of the City of Great Falls, development of Malmstrom Air Force Base, development of numerous farmsteads and accompanying facilities, and installation of numerous transmission lines across the Missouri River."

RUS and DEQ believe that the existing analysis is balanced in its treatment of visual and cultural impacts. The FEIS discusses and shows how the visual impact and

views have changed because of the proposed shift to the east of the HGS footprint to move it outside of the NHL.

All mitigation measures that relate to cultural resources have been included under Section 4.9.5 as well as their other location(s) under recreation and visual resources.

The FEIS includes a description of the Section 106 consultation process, including the parties involved, potential mitigation measures, the schedule, and the forthcoming steps to conclude the process.

- 17. Page 4-85, fourth paragraph under Mitigation Measures, fourth and fifth line and fifth paragraph under Mitigation Measures, first line. Please add language that indicates the areas have been disturbed by previous agricultural and industrial activities. C128*

Response: Section 3.7.2 in Chapter 3 already discusses agricultural and industrial activities that occurred in the area. We believe it is unnecessary to include this information under mitigation measures.

- 18. The Lewis and Clark National Historic Trail administration has reviewed the DEIS. They find the proposed construction of a coal-fired generation plant and four wind turbines within the boundaries of the Great Falls Portage National Historic Landmark to be an unacceptable impingement on the protection of this National Historic Landmark under the National Trails System and National Historic Preservation Acts. C28*

Why was the Salem site even allowed to encroach within the actual portage route boundaries and what ‘scoping’ was accomplished to that end with landowners, historical groups and with the USDA and Department of Interior? How could SME planners ever consider placing any portion with or near the Great Falls Portage National Historic Landmark and how does that reflect upon initial site selection screening criteria and consideration of viewshed? C80

A total of 545 acres of the landscape would be irreversibly and irretrievably lost for the proposed construction (Pg 4-135). This would be distributed along the wind turbine array, two 100-ft. wide transmission line corridors, 1.7-mile fresh and waste water line corridor (which would intersect a known campsite along the portage trail), raw water corridor and more than two miles of roads, all of which would impact a major portion of the eastern NHL area. Such a major disruption of the landscape would threaten the eligibility for national landmark status by destroying the integrity of the site. This would be an irreplaceable loss to the national heritage of our country for the construction of a facility with an expected lifespan of 40 years. No other site along the Lewis and Clark National Historic Trail representing the hardships of the Expedition is so accessible to citizens of any ability. Construction of the Highwood Generating Station at the Salem location is a major significantly adverse impact (Pg. 4-85) that cannot be reasonably mitigated. C28

The preferred alternative for the new plant lies in a setting that will without question result in irreversible and unmitigatable impacts to the integrity of the NHL. As the project is currently proposed, we believe it would require that the Great Falls Portage site be delisted from the NHL program. Despite the severity of these impacts, we do not find within the draft EIS a broad array of alternatives from which to draw feasible solutions, locations or designs for a project with less impact. We looked hard but did not find explanation of the criteria by which some two dozen other sites were reviewed and eliminated from consideration. C97

With regard specifically to mitigation suggested for the Highwood site, we see no consideration of avoidance measures or relocation of the facility and infrastructure away from the NHL. The mitigation measures suggested by your agency would greatly benefit from utilizing landscape architects or other skilled professionals to create a more suitable site plan that would minimize impacts to the greatest degree possible. This plan will result in heavy industrialization of an area which has until now remained relatively open and undeveloped. Suggested mitigation such as painting buildings green and planting trees would not begin to offset the impact of a major industrial facility with all of its components: power plant with 400-foot-high stack, four wind turbines, rail lines, transmission lines, access roads, and the perpetual activity of coal trains and power generation once operational. C97

We note that modern influences have begun to encroach upon the NHL, with Malmstrom Air Force Base the most visible within the viewshed. However, the NHL retains its integrity for virtually all aspects of integrity that guide NHL designation, and this plant is proposed to be built within the NHL boundaries, not somewhere nearby. C97

Listed as an NHL in 1966, the Great Falls Portage site was among the earliest NHL listings designated in our state. Within the state of Montana today there are just 24 National Historic Landmarks, within the United States there are just 2,500. They are places where history unfolded that is significant not only to Montanans but to our country. Places this important should be preserved for all Americans and for all generations. A location within a National Historic Landmark should be a place of last resort for construction of major industrial facilities. Montana is a big, big state. We cannot believe that this is the only feasible place to site a facility of this kind. C97

The National Trust for Historic Preservation is deeply concerned about the proposed Highwood Generating Station near Great Falls, Montana and its potential effects on the Great Falls Portage National Historic Landmark (NHL). The National Trust is particularly concerned that the Highwood Generating Station is proposed to be constructed inside the boundary of a National Historic Landmark, nationally significant for its association with Lewis and Clark. C101

Construction of the Proposed Action will include the power plant with a 400 foot stack, four wind turbines, a 5 mile rail spur, 14 miles of transmission lines, substation, water intake, water pipelines and access roads. DEIS at ES-5. The DEIS correctly identifies the construction of this facility as having an adverse effect on the Great Falls Portage

National Historic Landmark, since per the Proposed Action, the facility will be constructed within the NHL boundary and its visual intrusion will severely diminish the site's integrity of setting, feeling and association. C101

Of major concern is why the DEIS contains only two alternative sites, each with substantial impediments that render the selection of either one as the preferred alternative very problematic. The Proposed Action has a significant adverse effect on a National Historic Landmark and the Industrial Park site seems unlikely to be selected due to its proximity to the City of Great Falls and its inability to provide a site for wind turbines. We strongly believe that identification of another, more suitable site elsewhere in the state of Montana area warrants further investigation and find it surprising that only three other sites were identified and all were dismissed - Nelson Creek, Hysham or Decker. C101

Under Section 106 of the NHPA, USDA's obligation is to "ensure that the Section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process." 36 C.F.R. § 800.1(c). Here, it appears that consulting parties were identified and Section 106 initiated in June of 2006. This was several years after site assessment and alternative evaluation had concluded and other potential sites had already been dismissed for cost and concerns about environmental permitting issues, but without consideration of the project's likely significant adverse effect on the Great Falls Portage National Historic Landmark. C101

USDA must resolve adverse effects by developing and evaluating "alternatives or modifications to the undertaking that could avoid, minimize or mitigate adverse effects of historic properties." 36 C.F.R. § 800.6 (a). If the Proposed Action is selected, USDA will have foreclosed all opportunity to avoid the NHL and the only options remaining are to attempt to minimize or mitigate the effects. Locating the facility and its related infrastructure differently on the site might minimize effects, but additional analysis of that issue does not appear in the DEIS. We recommend that a landscape architect or expert with similar skills be consulted to assess how the facility could be sited differently. The list of proposed mitigation possibilities does not offer many feasible options because due to the scale of the project, screening with vegetation (not a current landscape feature) and paint color are unlikely to accomplish meaningful results. C101

We feel that locating the facility on a different site away from the NHL is the only approach that will satisfactorily avoid the adverse effects this project will have on cultural resources. If that approach is not selected, then we believe that substantial additional work on project location and proposed mitigation for the Proposed Action will be required both for inclusion in the final EIS and as part of the continuation of the Section 106 consultation process. C101

How have you addressed the visual and noise impact of this plant with loss of real estate values, closeness to Lewis and Clark historic site, and the overall image of the City of Great Falls? I believe the language should state that this plant WILL have and adverse impact on the historical site. C105

The EIS Cultural Resource Inventory clearly outlines that development of the station at the Salem Site would have negative impacts on recreation, and cultural and visual resources. Designation of a property as a National Historic Landmark means that the property is recognized as being of national significance and possesses exceptional value or quality in illustrating and interpreting the heritage of the United States. When a property is altered so that it has lost its ability to convey its national significance, withdrawal of the landmark designation will be considered. If a property ceases to meet the criteria for designation – the qualities for which it was originally designated have been lost or destroyed – withdrawal of the landmark designation is justified by the Department of the Interior. C144

We are deeply concerned that development of the Highwood Generating Station will threaten this area's Landmark status. A primary factor used to determine the Great Falls Portage's eligibility for National Register listing is the undeveloped nature of the viewshed within the defined corridor. According to the National Register for Historic Places nomination form, "the Landmark retains historic integrity because, other than scattered modern developments, the portage [route] can be seen largely as Lewis and Clark observed it." The Landmark currently is listed on the National Register and remains essentially unchanged from when it was nominated for listing. C144

We urge you to look closely at the impacts on this landmark and take steps to ensure that its national designation is not withdrawn. Once lost, it will be gone forever. If steps can be taken to preserve our national heritage resources, then they must be taken. C144

Proposed mitigation measures under consideration do not adequately address the known impacts on this site. We [Lewis and Clark Trail Heritage Foundation] would like to be included as a consulting party in consultation of proposed mitigation measures. C144

Response: These comments touch on several themes:

- **Presence of the HGS within the NHL boundary;**
- **The site screening and site selection processes resulted in too narrow an array of alternatives, especially within the Great Falls area;**
- **Potential loss of NHL status for the Great Falls portage;**
- **The EIS did not adequately address ways to avoid, minimize, or mitigate impacts related to the NHL;**
- **Industrialization of the NHL;**
- **Visual impacts and the use of a landscape architect to assist with developing mitigations;**
- **NHL importance to the U.S. and Montana; and**
- **Timing of the Section 106 consultation process.**

In the DEIS the majority of the HGS was located within the NHL. During the Section 106 consultation process, SME agreed to move the plant outside of the NHL boundary in an effort to reduce impacts. Only a small portion of the rail loop, a small portion of the transmission lines, a small portion of the entrance road, and the

wind turbines would remain within the NHL. The power plant itself, associated buildings, the monofill and the majority of the rail loop have been shifted to the east just outside of the NHL.

Additional information on the site screening and site selection process for the Great Falls area has been added to the FEIS. This information offers a more explicit rationale for the elimination of other Great Falls sites. It also explains how SME determined the Salem and Industrial Park sites were the preferred and alternate locations, respectively. The rationale for dismissal of other locations outside of the Great Falls area has also been expanded.

RUS has no intention to propose delisting of the NHL or any portion of it. It should be noted, as discussed elsewhere in these responses, that the northern end of the trail in Great Falls has already experienced, and continues to experience, significant development. If the primary consulting parties agree and sign the draft MOA included in the appendices of the FEIS, which contains numerous avoidance, minimization and mitigation measures to offset impacts to the NHL, delisting is not likely to occur.

The DEIS does list possible mitigation measures in Sections 4.8.5, 4.9.5 and 4.10.5. The FEIS lists mitigation measures to which SME has committed. Avoidance is addressed in part by moving the HGS off the NHL and discussing the site selection criteria and process for the Great Falls area sites. The remaining mitigations address both minimizing and mitigating impacts.

The HGS does bring an industrial facility in to a rural, agrarian setting near this portion of the NHL. However, the upper portage terminus, White Bear Island, is fully developed and is still part of the NHL. Moreover, the lower portage camp and initial portions of the portage route from Belt Creek to the staging area would remain undeveloped.

Visual impacts are an unavoidable consequence of the proposed action, but would be reduced somewhat by SME's redesign that shifts the site off the NHL along with other on site mitigations. The magnitude of the visual impact does vary depending upon the viewpoint within the NHL. A landscape architect would be useful in identifying mitigations to reduce visual impacts. SME has retained the services of a local landscape architect for that purpose.

The Great Falls Portage National Historic Landmark is important to Montana and the United States as it documents a key event in the Lewis and Clark Expedition. The portage around the Great Falls took approximately a month to move boats, supplies, and the Corps of Discovery on their westward trip. The designated staging area contains several displays describing the events that transpired and that the public can view to learn more about the portage. Although there are unavoidable impacts to the NHL, several mitigations would enhance the education efforts to

further explain to the public the events which took place during the Lewis and Clark Expedition including this portage route.

The Section 106 process was begun in accordance with the requirements of NEPA once the final alternative site locations were identified. Notice was sent to federal and non-federal consulting parties in June 2006 as well as appearing in the *Federal Register* at the time of the publication of the draft EIS and earlier at the time of the federal scoping meeting. A consulting parties meeting was held in October 2006 with more than 20 agencies and organizations represented. A number of mitigations were discussed and changes to the DEIS which would be incorporated into the FEIS were identified. The group visited the Industrial Park site, the Salem site, the designated staging area, and the Lewis and Clark Interpretive Center. The meeting succeeded in clarifying a number of issues and moved the process forward. Since this meeting, SME and the agencies have identified and developed mitigations. A draft MOA between the primary consulting parties is attached in the appendices of this EIS, which contains numerous mitigations to offset the impacts to the NHL.

19. *Please do not allow the coal-fired plant to be built at the Salem Road location. The Portage National Historic Landmark is a treasure that we should not squander. No amount of mitigation will be able to preserve the quality of the experience one may now have when standing on the site of where the Lewis and Clark Expedition camped, hearing the buzz of the insects in the heat, and breathing the fresh air. One can be an expedition member, imagining the toil of loading supplies and canoes and beginning the trek across the prairies and hills. One can experience the awe of the immense spaces which, coming from the east, must have been almost overwhelming. To be able to so connect with our past, using all our senses, is a rare opportunity. C152*

Response: Thank you for your comment.

20. *The Little Shell Chippewa Tribe has reviewed the draft EIS pertaining to the proposed HGS which is to be located across the river from the proposed Tribal Capital and Visitor Center at Morony State Park....The Little Shell Chippewa Tribe has discussed the mitigation measures at the proposed plant, especially those relating to air quality and potential impact on the historic preservation of the Tribal Capital/Morony Park site....It is our desire that an annual contribution toward preserving and maintaining Tribal Capital/Morony Park area be provided by SME to the Little Chippewa Tribe. C182*

Response: SME has indicated that it would entertain a request from the Tribe for support and evaluate a contribution in the context of its contributions to other related activities.

21. *The proposed Highwood Power Plant will be located across the Missouri River from a significant site of the Lewis and Clark Expedition. Placing this plant in this location will severely impact the continued tourist draw that this city has upon Americans from around the country. The tourism dollar will dwindle for Great Falls if this plant is built. C248*

Response: The DEIS finds that the Proposed Action does result in a significant adverse impact on the Great Falls Portage National Historic Landmark (NHL). However, the NHL itself receives very little visitation – as opposed to the Lewis and Clark Interpretive Center on the Missouri River in Great Falls – and therefore the city is unlikely see any diminution of its current heritage “tourism dollar.”

VIS-1100 VISUAL RESOURCES

1. *In addition to the natural beauty of the landscape is a sense of pride in the history of our region. Another area of concern is the location of the coal plant within the Lewis and Clark National Historic Landmark, where it creates a class IV (of IV) visual and auditory eyesore that seriously detracts from the pristine nature of this historic area at the base of the scenic Highwood Mountains. This type of view shed will become increasingly valuable with increased population growth. C20*

Response: Thank you for your comment. Visual mitigations in any final Memorandum of Agreement will be implemented that will minimize these impacts.

2. *Use of the Bureau of Land Management VRM method for evaluating the impact on visual resources is inappropriate for lands administered under the NPS which has higher standards for the conserving of natural and cultural resources for future generations. Under NPS standards, the goal is to avoid any further impairment, regardless of the base state of the resource. The Great Falls Portage NHL integrity is based predominantly on the visual landscape qualities of open grasslands presenting no barriers to wind and weather. The viewshed of the NHL has already been degraded by the presence of Malmstrom Air Force Base and the City of Great Falls to the west. Further degradation by construction within and adjacent to the NHL is a major significant adverse impact. C28*

Response: The BLM VRM methodology utilized resulted in a determination that, had the NPS visual impact analysis system or standards been used, would have resulted in the same determination. Both systems would have determined that the HGS would have a major significant adverse impact; therefore, the lead agencies have determined there is no reason to perform an additional visual analysis.

3. *Other than discussing the minimization of lights on wind turbines to reduce their attraction to birds, the effect of lighting for the proposed construction is not addressed in the DEIS. Under NPS policy, actions that decrease the natural dark skies are considered adverse. It is reasonable to assume that the level of lighting required for safe operation of the generation plant would adversely affect the night sky within the Great Falls NHL. C28*

Response: The effect of lighting has been addressed in the FEIS as an adverse impact. One of the mitigations identified in the Memorandum of Agreement is to utilize of directional lighting that will focus light downward to reduce glare to the night sky.

4. *What kind of trees does SME propose to install near their plant to mitigate the HGS-Salem plant's 'visual' footprint on the beautiful Highwood Mountain landscape? C80*

Response: In consultation with the various agencies, the use of trees has not been identified as an appropriate mitigation. SME would plant native grasses and shrubs in landscaping around the plant buildings.

5. *Page 4-92, second paragraph, second line. The reference to “Figure 4-16” is incorrect. The correct reference is “Figure 4-15”. C128*

Response: This correction has been made in the FEIS

6. *As for the viewshed, one need only ask the rangers at the Ulm Pishkin State Park about the effect of the wind turbines on Gore Hill on the ambiance at the buffalo jump. Those turbines are nearly ten miles away. I would not advocate the removal of those turbines on that argument. It merely illustrates that Montana views are vast, unfortunately so are the viewsheds. A coal stack, plus turbines, at a mile and a half are not an annoyance, they are destructive. C152*

Response: Thank you for your comment. Visual mitigations are included in the draft Memorandum of Agreement.

TRA-1200 TRANSPORTATION

1. *I would like to know how much it's going to cost the railroad to withstand that many coal trains coming here. C9*

The SME proposal calls for shipments of coal from southeastern Montana using an expensive captive rail service that relies on diesel fuel for the locomotives; when queried about the expense of shipping coal so far from the mine and where the bulk of the electricity is to be used, SME executives indicated they might purchase their own 110 car coal train (to run on the competitor's rail lines). Is the cost of a coal train factored into the \$515 million price tag for the coal plant? C20, C80

Coal trains are hard on rails; who is going to be responsible for maintaining the rails? Because coal trains are so long and have lesser priority than commodity trains, who is going to lengthen the sidings (so trains can pass one another)? Where is the funding coming from to build the miles of heavy duty steel rails around the new coal plant (at approximately \$1 million per mile)? C20

Response: Maintenance on the railroad is a cost of doing business and is outside of the scope of this EIS. The cost of purchasing two sets of 110 coal car transportation units (220 coal cars) is included in SME's budget. The cost of the rails in the rail loop and spur, which do not need to be heavy duty due to the low speed limits, is included in the estimated cost of the project.

2. *I could find no discussion of the potential impact of rail transportation on operation of the proposed plant and the cost of electricity to consumers. Several coal generating plants in the country have recently been unable to produce at full capacity because rail transportation is inadequate to deliver the amount of coal required from the Powder River Basin. Is this a short-term problem or is it one that will worsen as more coal generating plants are built? Having worked for a railroad at one time, I understand that rail systems have a maximum capacity to move trains beyond which building more locomotives and cars will not help; there's only one set of tracks. C317*

Response: The rail leaving the Powder River Basin to the south and east is a heavily loaded rail system. The noted difficulties experienced by utilities in other parts of the country are due to the limitations of this segment of rail. The current expansion of the railroad lines leaving the Powder River Basin testifies to the importance of resolving the near and short-term effect of this issue. The rail line from Billings to Great Falls does not appear to currently experience congestion problems, and it would seem unlikely that two coal trains per week would result in a need for modifications to that portion of the rail system. Because the railroads own the track and train engines, and schedule the crews for operations and maintenance, BNSF can develop a schedule that will support the needed deliveries from Southeast Montana to Great Falls. BNSF is the entity that will ultimately decide on a need for additional sidings to address congestion issues.

3. *The EIS should evaluate effects of any proposed road improvements, new road construction, and general right-of-way (ROW) construction activities on the area. The evaluation should include increased access, travel management and enforcement aspects, as well as impact to the flora and fauna of the area. C36*

Response: The transportation section has been expanded to address MDT's comments and requirement including these issues. Impacts to flora and fauna of the area are addressed in Section 4.6.2.

4. *Throughout the document: The document refers to Highwood Road as "S-228", "SR 228", and "State Route 228". It should be referred to as "Secondary Highway 228" or "S-228". The document should also mention that this road is on the Secondary Highway System. C94*

Response: These changes have been made in the FEIS.

5. *Throughout the document: Burlington Northern Santa Fe Railway changed its name to BNSF Railway in 2005. This name change should be reflected throughout the document. C94*

Response: These changes have been made in the FEIS.

6. *Page 3-95, Second paragraph: US 87 should be described as a "paved, undivided, two-lane principal arterial on the National Highway System". C94*

Response: This change has been made in the FEIS.

7. *Page 3-97, Figure 3-54: This map is out of date. See <http://www.mdt.mt.gov/travinfo/docs/railmap.pdf> for current map. C94*

Response: This map has been updated in the FEIS.

8. *As stated in Section 1.3 on page 1-6, MEPA requires DEQ to list and describe the responsibilities of federal, state, and local agencies that have jurisdiction over aspects of the Proposed Action. MDT is not listed among these agencies, but needs to be. MDT will have several responsibilities relating to traffic impacts and encroachment of rail access from the highway if the HGS is constructed. Also, permitting will be required from MDT and should be described. C94*

Response: This description has been added to the FEIS.

9. *Neither of the websites listed on page 1-22 & 1-23 for viewing the scoping report appear to exist (or, they are at least inaccessible with the listed website addresses). The scoping report was located on the DEQ website, but MDT's comments were not included with other agency letters received. Include MDT's comments in the scoping report. C94*

Response: The websites have been re-verified for accessibility. MDT's scoping comments are included in the RUS scoping report. MDT indicated at that time that it had no comments but would comment on the DEIS.

10. *MDT requires the highest level of railroad crossing safety be provided in the development of all projects. MDT strongly recommends a grade separated crossing and further recommends that S-228 be designed to go over the top of the BNRRT spur. This route is used by overheight loads because of height restricted RR overpasses on the other routes into Belt. Does Southern Montana Electric Generation and Transmission Cooperative, Inc. (SME) plan to include the funding for the grade separated rail crossing of S-228 in the project to address traffic impacts and public safety? C94*

Impacts associated with the construction of a grade separated rail crossing on S-228, such as traffic (especially movement of large farm machinery), cost, maintenance, and visual impacts need to be addressed. The Salem alternative has the most cultural/visual impacts of the discussed alternatives, and the grade separation and bridge may add to those impacts. C94

There are potentially significant Right of Way issues for the proposed project that should be addressed in the DEIS. If S-228 is upgraded and a bridge is built, Southern Montana Electric Generation and Transmission Cooperative, Inc. (SME) would be responsible for the purchase of the necessary Right of Way in the name of MDT. Also, federal and state Right of Way acquisition regulations need to be followed. C94

Response: A grade separated bridge for the S-228 crossing over the BNRRT spur has been added as a mitigation to the Salem site. SME would be responsible for acquiring the necessary Right of Way as described. Additional impact analysis has been included in Chapter 4 of the FEIS.

11. *In the Transportation sections (Sections 3.9 & 4.11) of Chapters 3 & 4 respectively, the DEIS should state that the 2005 ADT on the 4-lane section of US 87/89 is 4528. C94*

Response: This description has been added to the FEIS.

12. *The DEIS (page ES-10) indicates that for the Salem Site "The overall rating for impacts on traffic congestion from the Proposed Action would be non-significant and adverse." On page 4-96, the DEIS indicates "a peak of approximately 550 vehicles per hour could be entering and exiting the construction site for a short duration." MDT considers this number of additional vehicles to be "significant". The impact study needs to evaluate this increase in traffic. C94*

We anticipate that a majority of traffic will travel to the Salem Site from Great Falls on US 87/89, turning left at S-228. An evaluation of the increase in traffic of approximately 550 vehicles per hour on the operations of this intersection will be required, in addition to a mitigation plan addressing safety issues, which are a concern. Also, the LOS of the intersection of S-228 and US 87/89 needs to be examined. C94

When discussing the Salem Site location, the intersection of 10th Ave South and 57th Street will have an increase in traffic comparable to the S-228 and US 87/89 intersection mentioned above. The impact to the function of this intersection and planned mitigation needs to be stated. C94

Response: The FEIS has reevaluated and modified the impact determination. The 550 vehicles/hour figure is estimated only for the morning and afternoon commuting times, but the ADT nonetheless does increase significantly, and is projected to remain for the duration of the construction period. We agree that it would be appropriate to assume a decreased LOS during peak traffic times, possibly a LOS 'D'. These traffic increases and corresponding decreases in LOS have been more fully factored into the overall impact determination for traffic.

13. *Secondary 228 was constructed in 1957 with a 24 to 26 foot-wide typical section and has vertical and horizontal alignments that do not meet today's Safety and Design standards. The increased traffic and weight of the vehicles that will be using this road require that the DEIS address the damage that is likely to result to this roadway and indicate how the increase in traffic will impact driver safety. C94*

The DEIS needs to state whether there are plans to make improvements to S-228 to accommodate the increased traffic and load. If no improvements are proposed, it is possible that load and/or speed limits would have to be placed on S-228. Load and/or speed limits will impact loads to the HGS and will severely impact local farmers with agricultural interests who use S-228 for access. Concerns which should be addressed include: the economic impact of reduced loads and/or lower speeds; the current road condition; determining whether vertical and horizontal safety concerns need to be evaluated and mitigated. C94

The intersection of Salem Road and S-228 will have a high amount of turning traffic volumes. During and after construction of the HGS, the entering and exiting vehicles will likely include many trucks, with slower speeds and longer acceleration distances. Secondary 228 needs to have a Left Turn Lane, a Right Turn Lane and an acceleration lane constructed before HGS construction begins. Details on how the improvements will be completed and funded should be addressed. C94

Response: The FEIS better acknowledges the potential safety impacts of increased traffic, and has added additional detail in Section 4.11.5 regarding proposed mitigation for road usage, repair, and/or improvement. It should be noted that some of these considerations, e.g., road upgrading, will be influenced by the outcome of county and city (Great Falls) decisions on zoning, possible annexation, etc., as these actions may include requirements for infrastructure improvements.

14. *Page 4- 97 notes "The potential for increased accidents is addressed in Section 4.15.2.1" however, accidents are not addressed in this section. This statement needs to be corrected to reflect the location of this information. C94*

Response: This correction has been made.

15. *The Industrial Park site would use the Malting Barley Railroad spur for access. This would result in lengthy delays on the NE Bypass near 38th street because of long trains. Currently most of the trains through Great Falls move at a slow speed and several crossings would be impacted simultaneously because of the length and slow speed of HGS trains. This will seriously impact public safety when emergency vehicles are held up. C94*

Response: It has not yet been determined if the Industrial Park site would use the IMC spur or if a new spur would be built. This decision should take into consideration safety impacts due to the potential for blocked road crossings.

16. *The DEIS should recognize MDT's planned road widening project on US 87 north of Great Falls when discussing the Industrial Park site. C94*

Response: This information is included in the FEIS.

17. *Page 4-95, third paragraph, third line. Delete the last portion of the sentence which states "...though an undetermined number may stay on the site in RVs or campers....". There are no plans to have facilities to accommodate these activities on the Salem or Industrial Park sites. C128*

Response: This change has been made in the FEIS.

18. *Page 4-99, first paragraph, second line. Delete the portion of the sentence which states "...the existing rail spur to the IMC malt plant....". C128*

Response: The first two sentences of this paragraph have been modified to read: "For this alternative, SME would likely extend the existing rail spur to the IMC malt plant to accommodate the arrangement at the Industrial Park site. No specific route for the possible construction of a rail spur extension to the Industrial Park site from the existing spur to the IMC plant has been identified."

19. *Page 4-99, second paragraph, last full line. Correct the portion of the sentence dealing with coal deliveries by rail which states "...at street crossing, but **two trains per week would**....". Boldface added for emphasis. C128*

Response: This correction has been made.

20. *We [Federal Aviation Administration] have no comments on the documents from an environmental perspective....However, we remind you that you will need to consider whether or not the project will require formal notice and review from an airspace utilization standpoint. The requirements for this notice may be found in Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace. This regulation is contained under Subchapter E, Airspace of Title 14 of the Code of Federal Regulations.*

WE would like to remind you that if any part of the projects exceeds notification criteria under FAR Part 77, notice should be filed at least 30 days prior to the proposed construction date. C180

Response: Section 4.11.2.2 of the DEIS addresses the FAA's notification requirements on projects that utilize the nation's airspace. The language above supplied by FAA has been added to this section in the FEIS to further clarify SME's obligations.

FLU-1300 FARMLAND AND LAND USE

1. *More requirements are necessary than the DEIS stated SME agreement “to fill out Form AD 1066.” Means of compliance need to be defined. The current DEIS admits to emission levels that are known adversely to affect farm production. In particular, the coal plant will significantly harm organic farm production and private gardens. Under FPPA, development of other (renewable) energy sources is the appropriate alternative action that would not adversely affect farmland. [Appendix C-7] We are what we eat and the proposed coal plant will basically be poisoning the people and life of this region. C8*

Saying that the area farmland is not prime farmland is clearly wrong. C78

If built the plant should be north of Great Falls – would not be on the good farmland near Salem – the U.S. is losing much farmland due to various developments. We do not have an endless supply of good farmland. C266

My concern is that the land, the land that we live on and farm, what will be the deterioration of that over the course of 50 to 60 years of these emissions. Again, with computer modeling, I think it can be determined, be estimated how much mercury can we expect to accumulate during that time and will that be enough to decrease the value of the land. I think the land does decrease in value because of this. Shouldn't those owners of the emissions be liable for that decrease or that loss of value, including the City of Great Falls, if they're involved in this. C110

Response: The Natural Resources Conservation Service (NRCS), in administering the Farmland Protection Policy Act, uses a land evaluation and site assessment (LESA) system to establish a farmland conversion impact rating score on proposed sites of Federally funded and assisted projects. This score is used as an indicator for the project sponsor to consider alternative sites if the potential adverse impacts on the farmland exceed the recommended allowable level. The assessment is completed on the form AD-1006, Farmland Conversion Impact Rating. The AD-1006 assesses both soil and non-soil related criteria. The evaluation of farmlands at both project sites did not result in a determination of prime/unique agricultural lands or lands of statewide importance, based on the required numeric scores and review/concurrence by the NRCS. The intent of the FPPA is to avoid unnecessary conversion of farmlands, rather than any potential contamination of farmlands.

Contamination by either air emissions or water discharges is regulated by other laws and policies. The modeling conducted for the DEQ air quality permit process, as well as additional groundwater modeling in regard to the ash disposal site, resulted in the determination that emissions would be in compliance with state limits, and that there would be no impact from groundwater transport of contaminants. Particularly in regard to mercury emissions, the transport and fate of this substance is determined largely on a global scale. It is our understanding that the establishment and certification of organic farms depends primarily on the

absence of chemical pesticides and soil amendments rather than any effect of airborne contaminants.

2. *Is the R.U.S. going to require legal documents showing the actual purchase of the land needed for the plant, the annexation of the property by the City and agreements between the City and the Cascade County? C14*

Response: RUS requires any documents necessary to process loan applications and make lending decisions according to its policies.

3. *What are the jurisdictional, legal, and property tax issues that must be dealt with, since the City of Great Falls and Cascade County appear to be ‘salivating’ over the prospects, yet the County and State of Montana continue to tolerate protested taxes from another utility, PPL, to the amount of 13 million dollars? C80*

What provisions will be emplaced to discourage SME and ECP from EVER protesting its taxes, as PPL has now shown they can protest with impunity? C80

Response: Taxation issues such as these are addressed by the appropriate city, county or state authorities, and are outside the scope of this EIS.

4. *To what level is the City Planning/Zoning Board involved with annexing the site, and how will the public be provided the opportunity to comment on any proposed annexation? C80*

What is the accurate process for land annexation, since the checklist on page 4-103 is in error, since the Great Falls City-County Planning Board was DISSOLVED, thereby rendering the Jan 2000 date inaccurate? C80

Response: The Great Falls Planning Department’s annexation procedures are at this site: http://www.ci.great-falls.mt.us/people_offices/planning/procanexsub.htm. The correct information has been added to the FEIS. Public involvement policies are determined by Great Falls officials.

5. *Page 4-101, last bulleted sentence under Construction. Correct the number of wind turbines in the sentence which states “...The installation of four nearly 400- ft....”. Italics added for emphasis. C128*

Response: This correction has been made.

6. *Page 4-102, last paragraph. This paragraph makes incorrect assumptions about what would happen if the Salem Site was not annexed. It indicates that the Site would be ineligible to hook up to the City of Great Falls municipal water and sewer systems. This result may be accomplished by other means with the approval of the City. The wastewater could still be discharged to the City and the potable water could be brought from the City. C128*

Page 4-103, second paragraph, second sentence. There are other mechanisms for delivering city services to HGS which are currently under review. Therefore, this statement that SME “would apply for annexation prior to construction” should be deleted since such decision is under review. C128

Response: The text has been modified accordingly to reflect this information.

WAS-1400 WASTE MANAGEMENT

1. *SME has yet to “demonstrate that no leachate will migrate offsite or to aquifers.” Such claims by industry in the past have proven unreliable. How is SME’s claim different?* C8

The idea of burying toxic ash on site creates serious concerns. C266

Is the R.U.S. requiring documentation and the assurance that the water aquifers under the ash in the storage areas will stay in as pristine a condition as they are now? C14

Solid waste, the ash from a coal-fired power plant contains five percent hazardous substances including arsenic, cadmium, chromium, lead and mercury. Over 120 sites across the country have contaminated surface and groundwater due to improper disposal of ash and coal-fired power plants. At least three Superfund sites were created by improper disposal of this ash. And I think these are the things that we're going to be looking after in our grandchildren and our great grandchildren are going to be paying for this when we're gone, long gone from here. C18

Studies have not as yet been completed to demonstrate that contaminants from the stored fly ash and bottom ash (225 tons per day) from burning 1,177 tons of coal per year will not find its way back into the Missouri River and or the underground aquifer. Despite claims of the effectiveness of the natural clay liners for the encapsulated waste, the possibility of fractures and leakage exists and with the location of the plant so close to the Missouri River, even a small risk of groundwater/aquifer contamination must be taken seriously. Will these prudent studies be completed before the permit is issued? C20

In the section of the waste deposit in the form of ash one can reach the conclusion that this amount is a threat to public health and even more so when it is combined with air emissions. Chapter 4, p. 4-112, mentions that “Studies conducted by the University of North Dakota indicate that most heavy metals....are low enough that they would not adversely affect drinking water quality.” It is not mentioned who did the study, where it was done, and by whom it was funded. C29

*The use of scientific information on p. 2-41, **2.1.7.5 Hauling Ash to the High Plains Landfill** is at best sketchy scientific evidence if not distortion. The alternative method of disposing the ash material would require approximately 10-12 trucks per day for the transport. At least, SME admits that there is little scientific foundation. It states:*

*“Given that SME and DEQ **believe** that the bedrock beneath the proposed facility and the compacted clay liner would minimize downward migration of contaminated water into the ground water.....” In a so-called scientific document, the word “believe” does not belong in its content for it is easy to conclude that there is a downward migration of contaminated ground water is a reality. The question is: how much? C20*

Response: Despite a lack of legal requirements to do so, SME has agreed to have DEQ issue a solid waste license for the disposal of ash at HGS. SME has met with DEQ and has developed a plan that calls for responsible disposal of ash produced at HGS as described in the DEIS and FEIS. SME has voluntarily accepted the responsibility to continuously monitor the groundwater in the vicinity of the disposal site.

In the “No Migration Demonstration” submitted to the DEQ as part of the Solid Waste Management System License Application by SME, data were presented to the DEQ on the test results for the hydraulic conductivity of the ash and the soils, the concentrations of the metals in the ash and in leachate produced from the ash. Based on these numbers, a numeric model was run using a worst case scenario. Even using these conservative conditions, solute concentrations are below the limit of detection at a point 60 feet below the ground surface for 65 years. The glacial tills beneath the site are estimated at 110 feet thick. Then it is another 140 feet through a confining shale layer to the uppermost water in the Kootenai Formation. For modeling purposes, the top of the Kootenai was used as the top of the aquifer, adding another conservative parameter. To be conservative, the model did not include a compacted clay liner.

Since the fly ash produced at the proposed plant would be in a dry form rather than a wet slurry like some other plants, the hydraulic loading on the natural clay liner would be minimized. The ash would have a hydraulic conductivity of about 0.0158 feet per day and the glacial till clay was assigned a value of 0.00023 feet per day, an order of magnitude faster than the lab determined permeability. The metal content of the ash leachate (TCLP) is less than 0.5 parts per million for all metals except barium, so the concentration of 2.0 parts per million, a little above the highest barium concentration of 1.6 ppm, was utilized in the model as an additional conservative estimate. The TCLP limit for barium is 100 ppm. The highest mercury concentration was determined by modeling to be 0.0024 parts per million and the TCLP limit is 0.2 parts per million for mercury. The total metal concentrations in the ash are less than half of one percent.

In short, the model demonstrates that the monofill would meet the requirements that the groundwater at the point of compliance not be contaminated for the life of the landfill units and the post closure care period. (See ARM50.723(3).)

2. *The DEIS does not address how it will comply with the Montana Hazardous Waste Act to protect the public safety and welfare. Where and how will hazardous materials be transported off-site to meet MWA requirements? Such means need to be spelled out in the FEIS. C8*

Response: This was addressed in the DEIS in Section 4.13.2.2, Waste Management, Operation, Other Wastes. The HGS would comply with all Montana requirements for the management of hazardous wastes.

3. *The fly ash storage has not been fully addressed. Will the R.U.S. make public all the documents showing the cost of each storage site needed for the 225 daily tons of solid waste from combusted coal? C14*

Response: The costs for the use of the on-site disposal at the Salem location is estimated by DEQ to be approximately \$1,875 per day, exclusive of hauling costs. This is based on a cell construction cost of \$2.50 per yard of capacity and a placement cost of \$2.50 per yard for material with a density of 1,200 lbs/cubic yard. Typical costs for disposal at an independent landfill as would be required at the Industrial Park site would be about twice this, but these contracts are normally proprietary information. In addition, hauling costs at the Industrial Park would be higher because of the increased haul distance and the need to use smaller highway capable trucks instead of larger construction style equipment.

4. *Since there are currently no Montana laws governing toxic solid waste from coal plants, how can there be any enforcement actions if there is groundwater or aquifer contamination? C14*

Response: Groundwater quality is protected under the Montana Water Quality Act. Enforcement would be through that statute. SME has voluntarily applied for a solid waste license and any surface water or groundwater quality violations would be processed under that license as well.

5. *How many trucks will be needed to continuously deliver limestone and haul the ash? What type of road will be used; will gravel roads be paved to reduce dust? Is Cascade County responsible for the roads being used by the coal plant during different seasonal conditions and around the clock usage? C14*

Response: The Salem site requirements follow – Approximately four trucks per day would be needed to haul the limestone if it did not also come by rail. Six loads of ash would be hauled to the landfill on a daily average. The internal roads would be maintained by SME and would need to be watered to control fugitive dust. Other dust suppression treatment such as magnesium chloride may also be used, if needed. Cascade County would be responsible for maintaining Salem Road unless other arrangements were made with SME.

6. *The Salem site at which ash will be deposited drains into the pre-Ice Age river bed of the Missouri river. It follows a path along the Highwood Mountains and travels north entering the Missouri a few miles down river from Fort Benton. The above stated High Plains Landfill drains into the Missouri a few miles from Great Falls. It does not take a rocket scientist to know that contaminated water from the “clean” burning coal plant will enter the river. This imposes a health hazard for communities down river and, more serious, the DRAFT EIS fails to examine adequately the flow of mercury contaminated ground water and its impact upon the environment. C29*

Response: The geology of the site is addressed in Sections 3.1.1 and 3.2.6. Industrial waste water would not be discharged into the Missouri River from the HGS but sent to the Great Falls municipal waste water treatment plant for treatment prior to discharge. The discharged water must comply with the treatment plant's MPDES permit limits that are protective of surface water uses and quality. Groundwater issues are discussed above in 1-1400. Storm water runoff within the plant area would be collected in on-site ponds and not allowed to discharge into drainages leading to the Missouri River.

7. *What landfills have been identified with county approval for the Industrial Park site option? C80*

Response: The Montana Waste Systems landfill near the industrial site is the most cost efficient option for operations at the Industrial Park site. The landfill is near the Industrial Park and is licensed by the DEQ as a Class II Landfill and is allowed to take the ash according to Montana Solid Waste rules.

8. *The EIS seems to discount the problems associated with ash disposal. Near Colstrip water is seeping through the ash and has contaminated several wells of neighbors near the ash pits. Wells are becoming highly saline and may not be usable for stock. The EIS needs to take into account the ash seepage that may occur with this plant. It could reach the waters of the Giant Spring. C104*

Response: Colstrip uses a wet slurry method of ash handling which poses completely different issues associated with this method of disposal. The dry ash handling methods of the proposed plant would not have these disposal issues. See comment 1400-1 above for more information regarding groundwater infiltration at the Salem site.

9. *Page 4-110, last paragraph, third line. Revise the portion of the sentence which states "...dewatered to a **thick slurry** consistency...". Boldface added for emphasis. C128*

Response: This statement has been modified to read as follows: "... This material would be dewatered to a ~~filter cake~~ thick slurry consistency ..."

10. *Page 4-111, last paragraph, second line. Revise the portion of the sentence which states "...appropriate, filter **slurry** would be conveyed...". Boldface added for emphasis. C128*

Response: This statement has been modified to read as follows: "... Ash and, if appropriate, filter ~~cake~~ slurry would be conveyed ..."

11. *Page 4-112, first paragraph, ninth line. Revise the portion of the sentence which states "...moisture **through out** the growing season...". Boldface added for emphasis. C128*

Response: This statement has been modified to read as follows: “...This storage and capillary action allows the plants to use the moisture ~~thru-ought~~ throughout the growing season ...”

12. Page 4-113, second full paragraph. Add the following to this paragraph in front of the last sentence. New text is in boldface. “...could contaminate nearby water resources. **The boiler blow down wastes and cooling tower blow down waste will be discharged into the waste water stream which will be pumped to the City of Great Falls wastewater treatment facility. As noted above, the demineralizer regenerate waste will be used to reduce dusting by utilizing the slurry material in the bed ash and fly ash pug mills when loading the ash haul trucks. Finally, the boiler chemical cleaning waste will be captured in special containers to be tested for metal content. The level of metal concentration will determine the disposal method. If allowable, the slurry will be admitted into the wastewater stream and discharged to the City of Great Falls wastewater treatment facility. A dedicated, zero outflow evaporation pond...**” C128

Response: The paragraph has been modified accordingly.

13. *We decided we better do something about solid waste or fly ash disposal. And it's not regulated in the State of Montana. But we decided to voluntarily ask the Montana Department of Environmental Quality for a license to work on that issue. And we did that because there were some local concerns here about it. We feel that we've been very active.* C159

Response: Thank you for your comment.

HHS-1500 HUMAN HEALTH AND SAFETY

1. *Based on comparison of modeling results in the prevailing direction downwind with ambient air standards, Southern Montana Electric has shown that the impacts to residents downwind are not a public health concern. C11*

Response: Thank you for your comment.

2. *There is no review of possible impacts to human mental health by the positioning of a dirty coal plant just outside the city. Could this be contrasted with the positive regenerative influence of a wind farm within view? On a very basic level, one type of development symbolizes the pursuit by moneyed interests of short term profits, while the other sends a clear signal of hope and concern for future generations. C10*

The EIS has done an extremely poor job at characterizing the true adverse effects of this pollution on public health and the environment. C17, C168

The EIS must include all health information, and not rely on regulatory assumptions of safety. There is a prevalent assumption among permitting agencies that if the modeled ambient pollution levels do not exceed the NAAQS/MAAQS, then the pollution is not harmful to public health. Numerous scientific studies have shown this assumption to be false. The NAAQS/MAAQS are not updated in a fashion that can keep up with scientific advances on the effects of pollution on public health. Thus, although permitting agencies might feel hamstrung in their ability to regulate emissions stricter than what would violate the NAAQS, the EIS process is under no such restriction. It is the EIS process that allows the public to understand the true impacts a facility will have on the surrounding environment. This EIS is lacking in fully revealing the public health implications of this project. The scientific studies mentioned in these comments should be reviewed and incorporated into the next EIS document. C154

We believe its important to be on record, that in 2006, significant scientific evidence is available to the USDA and the DEQ which clearly indicate that coal-fired power generation with a circulating fluidized bed technology generates emissions of both criteria and toxic air pollutants that are detrimental to public health. Coal-fired power across the country is responsible for increased death rates, increased rates of disease and developmental effects in children. This EIS should be absolutely clear, that these sorts of public health effects could result from the Highwood Generating Station, even with the best technology we have. C154

These plants spew poison. Your health and that of your loved ones is not as important as their profits. C38, C51, C62

I am opposed to anything that increases heavy metal pollution and threatens public health. Per the draft air quality permit, the proposed plant is projected to emit 40 pounds of mercury per year and 366 tons per year of particulate matter (containing other heavy

metals such as arsenic, beryllium, cadmium, manganese and lead). And that's only part of the pollution. C56

As designed, the project would needlessly threaten public health and environmental quality by emitting thousands of tons of regulated air pollutants each year. C54, C61, C63, C85, C87, C108, C116, C137, C202, C209, C210, C212, C213, C214, C215, C216, C217, C218, C219, C220, C221, C222, C223, C224, C225, C226, C227, C228, C229, C230, C231, C232, C233, C234, C235, C236, C237, C238, C239, C240, C241, C242, C243, C244, C245, C246, C247, C252, C253, C274, C278, C282, C285, C286, C287, C295, C300, C310, C312, C319, C330

A new coal plant in the Great Falls area would contribute lowering the health of humans and other life surrounding the city of Great Falls. C122

As an employee of the City County Health Department, I was dismayed to read (ES-11) that "Overall health and safety impacts of the plant would be adverse but non-significant." There are so many scientific studies that prove coal plants are significant contributors to poor health. Based on the figures, there is no way the HGS can be a clean coal plant! C167

The technology the plant will utilize is outdated and will jeopardize the rights of future parents and children and Montana and beyond to live healthy and productive lives. C170

As a practicing physician and new mother, I have many concerns regarding the generation of air and water contaminants affecting the health of our citizens and families....I moved to Montana 12 years ago to escape the very situation that SME's proposed plant threatens to create here. C174

I am writing for my concerns on the coal burning plant. I think this will be a risk to my future and millions of others because it can affect our health, not only is it going to destroy our environment but everyone and every thing that lives in it by putting them at risk to health problems mentally and physically. I hope & wish we do not get another polluting plant in this state. Thanks for your time and your consideration. C197

My grandchildren I'm raising...have smoke allergies....As for my spouse and I, we have lung problems, CPOD, emphysema, and pneumonia constantly. We are on oxygen twenty-four hours a day. We take medication for our asthma, allergies, lung and other medicines. As for myself, I'm on fifteen different medicines....My father worked at the coal mining company in 1951-1953 until I was six months old. To this day he has lung problems....These are the reasons I'm against the power plant. C199.

I am a person with asthma, so my body is quite sensitive especially to chemicals. In the past I had to give up my job in cleaning medical equipment on a daily basis in the hospital. I was constantly breathing the fumes, and eventually ended up very ill and having to take time off of work. C204

Think of our lungs, think of the tons of particles settling on the wheat fields of the Golden Triangle and adding heavy metals to your pasta, cereal, and bread. C279

When they had above ground nuclear testing the winds brought the radioactive fallout, which settled over Montana, and now we have abnormally high rates of cancer in central and eastern Montana. I was told this by a doctor who treated my father for cancer. These same winds will bring the mercury and other pollutants produced by the Highwood coal plant. C299

Response: The U.S. Environmental Protection Agency (EPA) is the lead federal agency charged with protecting public health from environmental pollutants, and as such sets applicable standards in the framework of political, regulatory, budgetary, and administrative factors and constraints. States are charged with setting enforceable emissions limits, through permit processes among others, to implement the broad national standards set by the EPA. The EIS, in Section 3.3 and Table 3-3, recognizes the various human health effects due to air pollutants. The NAAQS and MAAQS do not imply that non-exceedance equates with ‘no harm’ to human health. However, both state and federal standards have been set with a margin of safety to protect human health and the environment. Human health is adversely affected by air pollution, among a multitude of other environmental factors. Air quality standards, which are regularly (albeit slowly, given the framework just described) updated to be more stringent, to match and encourage improved pollution control technology and other market- or policy-based mechanisms to limit emissions. The EIS process is ‘restricted’ in that it is not intended, or allowed, to establish law, policy, or regulation, but rather to assess environmental impacts in part by examining a proposed action in light of existing law, policy, regulation, and scientific information.

3. *I've heard people speak that, well, we've been living in pollution for years, and none of us have died. Well, there's a thing called threshold poisoning. And after Chernobyl, they looked at it, the people that refused to leave Chernobyl. And there were some families that their dogs lived, their cows, everything. But there were other people, probably 10, 20,30,000 died. So that's the way it is when you have threshold poisoning. It's random. You might have a lucky family. You might live for generations. Other families can be desolated and wiped out. And whole families seem to be weaker. So just because somebody has lived by a power plant doesn't mean that it's safe. C51*

Response: Thank you for your comment.

4. *What will the State of Montana do to monitor the health and safety of citizens downwind of the HGS-Salem site, particularly residents of Fort Benton and Big Sandy, as the EPA examined the old mining site in the town of Neihert to assess health and safety of those residents? C80*

Response: Computer modeling conducted as part of the Montana air quality permitting process has demonstrated that all potential downwind impacts from pollutants emitted by the proposed project are in compliance with the applicable requirements of law including, but not limited to, compliance with the health-based NAAQS and MAAQS. In accordance with DEQ policy related to ambient monitoring, because pollutant emissions from the proposed project are relatively minor, the Supplemental PD for MAQP #3423-00 does not require ambient monitoring of the criteria pollutants or HAPS. The primary NAAQS and MAAQS provide a margin of safety to protect human health.

5. *What legal actions could the City of Great Falls AND Cascade County be exposed to and liable for if any health and safety problems that could be linked to the operation of either plant site? C80*

Response: The potential for such legal actions is outside the scope of this EIS.

6. *Historically, I've served as the CFO of companies as an entrepreneur. And one of the companies I co-founded is a company that's called InfoMed, and we provide health and communication based pulmonary diagnostic services. We at one time had the largest pulmonary diagnostic database in the world. And one of the things I learned, you know, in working and co-founding the company and watching it grow and developments I learned a little bit about chronic obstructive pulmonary disease. And I can tell you that it is very directly associated with particulate effluents from plants such as the one we're planning to build. C112*

Response: Thank you for your comment.

7. *Page 4-120, paragraph under Mitigation, third line. Delete the portion of the sentence which states "...cleaning coal before it is combusted would reduce the contaminants released into air emissions following the combustion process....". Coal cleaning is not an option for the project. C128*

Response: This correction has been made.

8. *Right now, pregnant women, women of child-bearing age, and children are told not to eat shark, tile fish, king mackerel, or swordfish, and to limit consumption of tuna (a staple in most women's diets) because they are so contaminated with mercury. In Montana, 54% of the lakes and rivers tested have resulted in mercury levels considered over the safe limit by the FDA. These same populations are told to avoid eating walleye and lake trout over 15 inches in length. Our waters are polluted because industry has been allowed to output so many toxins into the environment. The proposed Highwood plant looks no different. C137*

Response: In compliance with recently implemented, and more stringent, state and federal regulation on mercury emissions, the HGS would emit lower levels of

mercury than currently operating coal-fired power plants, and these levels would continue to decrease as lower limits phase in over succeeding years.

9. *Americans living near coal-fired power plants are exposed to more radiation than those living near up-to-standard nuclear power plants. C169*

Response: Section 4.14.2.2 of the DEIS addresses the issue of radiation exposure to near-by residents from uranium and thorium emissions of coal-fired power plants. Like many naturally occurring materials, coal contains traces of radioactive uranium and thorium: an average of about 1 part per million (ppm) of uranium and 3 ppm of thorium. By comparison, the average brick contains about 8 ppm uranium and 11 ppm of thorium. EPA cites a figure of 0.03 millirem/yr radiation exposure within 50 miles of a coal plant. Given the overall average background exposure of 360 millirem/yr for the average person, this EPA figure would suggest that living near a coal plant is not likely to increase a person's radiation exposure by more than a very small amount. Therefore, while a nearby resident's exposure to radiation may well be greater in the presence of a coal-fired plant than a well-functioning nuclear power plant in the U.S., the implications for health appear to be negligible.

SOC-1600 SOCIOECONOMICS

1. *The DEIS is too limited in scope and does not talk about the huge issue of perception. This CFB plant will be considered a “dirty plant.” Children are at risk; therefore families will move away or not choose to live here. The aura of an outdated coal-fired, dirty, inefficient generating plant will be a big turn-off to other main industry regardless of how well officials tout it. Would Great Falls perceived identity be sealed if we did? Are we in danger of becoming an Appalachia of Montana with lower property values and outdated coal plant? C4, C8, C20, C24, C111, C134*

The attraction of 65 well-paying jobs, plus the hundreds of temporary construction jobs for years is very appealing, but what is the long-term consequences socioeconomic effects if tourists and prospective residents and businesses bypass Great Falls due to the ‘negative’ perception of a smoke-filled ‘Big Sky’ and ‘scarred’ landscape, and has that been impact been quantified? C80

How can a moderate socioeconomic benefit and virtually ‘outweigh’ all the other adverse and potentially significant impacts regarding water, air, human health and safety, cultural and visual resources, not to mention the ‘stigma’ Great Falls and Montana will incur when we ‘degrade’ our reputation, and lust for the Big ‘dirty’ Sky, and will we be the ‘Last, Best Place’ to ‘Live, Right, Here’ at the Great Falls Chamber of Commerce touts? C80

A CFB plant will stifle economic development in the region (this has been proven in other locales). Many Great Falls residents live in this area by choice, many at lower salaries than they could easily earn elsewhere. They value the quality of life our clean environment offers. A significant number of them would not choose to live and work in a community affected by a CFB coal plant. C8, C20, C111, C134, C150

I also question why the poorer, less prosperous area of Great Falls and Cascade County is being asked to add visual, noise, mercury and carbon dioxide pollution to it's environment when most of the power will be going to growing economically robust areas hundreds of miles away. I think this will add to the economic problems of our area, not help as the EIS states. C45

I think I speak for a lot of people when I say that this plant looks much like a boondoggle. I don't think it's even economically makes sense. And if we're going to talk about economic development, economic development has to make economic sense. I think the potential for economic harm from this particular proposal could do a lot of substantial damage. C74

By granting this permit in this form, the DEQ becomes an agent (and responsible) for bad economic development and environmental degradation this type of coal plant would have on this region. C78

The people behind this plant would tell you that the jobs brought by the plant would boost our state's economic standing, its true. More jobs, means more money. Money which will be needed badly by the families whose children develop asthma from the exhaust of fumes. Our fishing and hunting revenue would drop because the fish were no longer safe to eat due to increased mercury. The wildlife in general would drop due to the increase in pollutants in the water and food. 46 pounds of poison per year. Mercury attacks our nervous system. Our BRAINS, our ability to think, remember, communicate. I, for one enjoy remembering my name....After all is said and done what this comes down to is money. Do we want small amounts of money and a little extra electricity now and Billions of dollars spent cleaning up later. Or do we find another way to power our lives that would not condemn our children and grandchildren to picking up after us and our selfishness. C208

Economic development for Great Falls is not so important that we put our residents' lives at risk. C284

I have serious concerns about a reduction in quality of life in Fort Benton and communities downstream. C315

Response: The DEIS did not include the type of social impact analysis that might have gauged resident's perceptions about or attitudes toward the proposed plant. Many comments have been received that express some opinion toward the plant in terms of its 'cleanliness', the efficiency of the proposed combustion technology, and its potential effects on health and safety. These opinions, as expected, cover a wide spectrum, from total opposition to total support. In considering SME's loan application, RUS must consider the proposed design and combustion technology in light of the current industry standards. Although CFB combustion has been in use for some time, it remains among the cleanest current methodologies in terms of emissions and combustion efficiency, and also one of the most reliable. Other technologies such as IGCC are on the verge of full commercial viability, but at this time, or in the near future, do not present the level of certainty required on the part of SME and RUS. The EIS has fully analyzed the potential health risks due to the proposed plant. The Great Falls area already has an industrial base and history that has apparently not deterred many residents from moving to the city or remaining there.

The EIS evaluated a range of impact areas, and concluded that, with some exceptions, by and large the proposed HGS would not significantly impact the environment and quality of life in the Great Falls area. In the various public meetings that have been conducted for the proposed project, and in summarizing the comments received, the possibility of large numbers of residents re-locating due to the HGS has not been raised as an issue of concern.

The economic benefits of the power that would be generated by the HGS would be disbursed over a wide area in Montana. Current state law regarding power supply in the Great Falls area, and any changes thereof, would have a large influence on

potential local economic benefits. Environmental justice was considered in the EIS, and it was determined that there would not be any disproportionate impacts on low-income or minority populations in the area.

2. *What particular financial risks might the citizens and taxpayers of Great Falls assume, since the city's \$125 million share of HGS will be financed by bonds? The city commissioners have all assured us that these are revenue bonds that will be repaid from income generated by the plant. Furthermore, the commissioners have all been told, and I believe them, that all of the financial risks rest with the revenue bond purchasers and that the bonds will only be sold to sophisticated investors who understand the risks of junk bonds. And that it is what revenue bonds are. However, I have a draft letter from the bonding attorneys stating that, quote, "The bonds are valid and binding obligations of the city." This sounds like obligation bonds to me, something very different. How can the city obligate the taxpayers to this kind of indebtedness without a public vote? C8, C20*

Response: The financing issues of Great Falls were evaluated to the extent necessary by RUS in reviewing SME's loan application. These issues, particularly the nature and approval of any bond issues, are governed by the City, and are outside the scope of the EIS.

3. *The DEIS neither accurately nor sufficiently addresses Montana Environmental Policy Agency (MEPA) requirements to consider:*
 1. *potential growth-inducing or growth-inhibiting impacts, particularly the latter*
 2. *economic and environmental benefits and costs of the Proposed Action*
 3. *the relationship between local short-term uses of man's environment and the effect on maintenance and enhancement of the long-term productivity of the environment C8*

Response: The EIS addresses the fact that construction and operation of the HGS would provide both temporary and permanent jobs in the Great Falls/Cascade County area, both direct and indirect. Off-site mitigations for impacts to the Great Falls Portage NHL would provide socioeconomic and educational benefits to the local community. The relationship between local short-term uses of man's environment and the effect on maintenance and enhancement of the long-term productivity of the environment is covered in Section 4.19 of the DEIS.

4. *Will the profits from selling the electricity go to the State of Montana? How will it relieve our taxes? C32*

Response: As a cooperative, SME is a non-profit organization. Benefits from sales of electricity should go to its customers in the form of lower rates, incentives, improved reliability, and better service.

5. *Alternative sources for electricity require workers too, generating jobs. C33, C111*

I would like to say to organized labor that as a lifetime member of my own union, I want you all to recognize that building an IGCC plant or wind power is going to take labor and provide jobs just like the plant that they're planning to build. C132

Response: Thank you for your comments.

6. *As for the need for jobs to keep our young people in the state, have them to go into environmental engineering. I would venture to say that with all the environmental disasters already in the state, since whenever seem to learn, we could employ thousands. C38*

Why do we push economic growth so much? I always remember why everybody complains why do our kids, after they graduate, have to leave Montana? Because we don't have the jobs. Why can't we bring them back? Because we don't have the jobs. As we build economic development, there is a very big enthusiasm among Great Falls residents, greater than I've ever seen it before, to build jobs in Great Falls, because if we do that, the jobs will pay more money. We'll be able to bring our children back, and we'll be able to have our children not leave. That's why. C115

Response: Thank you for your comments.

7. *As indicated on page 3-106, coal fields near Great Falls were mined for use in industry, so would that ever be considered again to provide coal to either CFB coal plant site, if the cost of rail transportation (and carbon taxes) were to present local coal as more economical for SME? C80*

Response: SME conducted a detailed review of these reserves as a potential fuel supply, and concluded that the coal reserves in the Great Falls area are not currently a viable fuel supply option. It is uncertain if these reserves would ever become a viable fuel option. If such an option were to be considered, a process of preparation of a proposal, dialogue with appropriate government agencies and other stakeholders, and likely an environmental impact assessment, would be conducted.

8. *What amount of money is being offered to LANDOWNERS for either site, particularly when it will be PUBLIC funds provided via the USDA RUS and ECP, and who will actually 'own the property deed,' SME or ECP? C80*

Response: SME would be the owner of the HGS property. The purchase price would be available from county records.

9. *A second source of risk arises from the plant's dependence on large quantities of coal, which represent a significant portion of the plant's annual operating costs. Consequently, any financial projections (such as the expected cost of energy to the consumer) are heavily dependent on the assumed cost of buying and transporting coal. Backers of the plant predict it will supply electricity at an attractive price of less than \$50 per*

megawatt-hour, but have given no indication how sensitive this price is to changing market conditions. Because the proposed plant is not located at the “mine mouth,” it will be profoundly affected by any variability in the transport cost of coal. With 1.1 million tons of coal being shipped each year from southeast Montana via diesel locomotive, those costs could be substantial. C95, C134

The costs for generation from this coal plant will not be stable. The costs for coal can and will go up, and the cost for diesel fuel is certainly volatile. The customers will not be paying so much for the coal as for the freight to get it from the Decker area to Great Falls. I also suspect that your estimated costs per kilowatt- hour will be higher than you estimate and will go significantly higher in the future. If SME had opted for combination wind and hydro, those costs would have been subject to much less long-term inflation. C106

Response: SME has considered these factors and contingencies in its calculations. The financial analysis conducted by SME considered the market history and future projections of coal and other materials that would be required for the HGS. In addition to providing the financial data submitted as part of its loan application, SME officials meet on approximately a quarterly basis with RUS to discuss current status and provide any updated financial data as necessary. The analysis by necessity must include the cost of transporting these materials; this factored in variable transportation costs (i.e., fuel price escalation) associated with coal deliveries from southeastern Montana.

The consideration of “carbon risk” is highly speculative; though many industry and policy experts consider the imposition of a “carbon tax” or similar mechanism as potentially useful/probable, none to our knowledge have ventured as to if, when, or by whom such a tool would be implemented. The need for diversification of energy portfolios is gaining growing recognition, at the current time primarily at the state level in terms of actual “renewable portfolio standards” (including in Montana). SME has indicated it would use the wind energy component of the HGS to provide practical operational data to assist in expanding this element in the future.

The inclusion of hydropower as a renewable energy component is becoming more limited due to the unlikely possibility of any new hydropower construction, and the increasing demand among existing and new customers for existing hydropower resources. A significant number of energy, environmental and economic policy analysts, while obviously recognizing the need to take urgent steps to limit greenhouse gas emissions, also acknowledge that coal will remain a main component of the nation’s electricity generation for some time to come.

10. *In light of the increasing cost of energy and other commodities, the expected cost to the consumer of \$46 per megawatt-hour is even less plausible. As early as February 12, 2005 a Great Falls Tribune article stated that the construction cost of the plant would be \$515 million (up from \$470 million). According to the U.S. Department of Energy website, the price of gasoline at the pump at that time was \$1.91 per gallon. In contrast,*

the price for gasoline at the pump in July 2006 was listed as \$2.98. That is a 56% increase. Yet there has been no corresponding increase in the estimated construction cost. DOE's estimate for the February 2005 cost of diesel was \$2.02 per gallon. That price is now \$3.02 per gallon, a 49% increase. How can the DEIS rely on a number that was generated 18 months ago when important factors affecting the cost of construction have changed so dramatically? C95, C134

In light of these variables, the "expected cost" should not only be readjusted, but should also include error bars that indicate the possible range of costs around that number, due to carbon risk, fuel-price risk, and other factors. NorthWestern and many other utilities employ a comparatively sophisticated modeling process that produces a "risk adjusted expected cost," a figure which more meaningfully conveys the cost of competing portfolios. Wind, solar, and other renewable energy sources carry no carbon risk and no fuel costs. C95, C134

As every investor knows there is considerable risk that comes from "putting all your eggs in one basket." SME's overdependence on a single fuel type (coal) and a single power plant (Highwood) amplifies the risks described above. Responsible portfolio planning emphasizes both fuel and resource diversity, a principle which is central to the PSC procurement rules that direct NorthWestern's planning process and which is also acknowledged on page 1-15. And yet the only other sources of electricity that SME currently anticipates using are the 20 MW WAPA contract and a 6 MW wind project. In other words, the Highwood project would account for over 90% of the energy portfolio of SME -- hardly a "balanced and diversified supply portfolio." If something were to go wrong with the plant, SME would be almost entirely at the whim of the notoriously volatile spot-market. C95, C134

Response: The future cost of diesel fuel to transport construction materials and later, coal, to the HGS would vary and may well increase over the long-term. SME is aware of this possibility and has included it in its analyses of future costs and revenues.

Coal-fired power plants, and CFB boilers are considered quite reliable by industry standards, which is a major factor in SME's selection of this technology. Thus, SME does not expect to be entirely at the whim of the spot-market. Wind and solar also carry some carbon risk and fuel costs (though less than fossil fuels) related to manufacture and delivery of their components.

- 11. The Great Falls Development Authority, which represents many investor businesses in Great Falls, is in support of the proposed plant. Our organization raised two-and-a-half million dollars four years ago. Some of it came from the city, some of it came from the county, some of it came from the airport authority. But most of it came from individual businesses to spur the economic development in Great Falls, because it's been bad for many years. And so that shows you the kinds of support that we have for economic development. C115*

There are numerous coal fired plants being discussed, planned and built throughout the country and especially in the West. Montana workers deserve the opportunity these good paying jobs will bring. Montana's economy as a whole will benefit greatly from this project. C267

Don't be obstructionist, let Great Falls and the area grow. Think of the jobs that will be offered, the construction companies that will benefit and the taxes that will result and as an added benefit the taxes that the construction companies and workers will pay. Also Montana coal will be used. As I see it, it is a win-win situation. C270

We have been very successful in our life and thought that this was one thing that we could do that would benefit the community and the state. It is regrettable that such good farm ground is needed, but you can't build a plant like that on the rough ground and run a railroad to it. This plant will generate in taxes that will probably be in the neighborhood of 4000 times what we are paying in property taxes. C271

This plant will bring stable and good-paying jobs to Montana's economy. The natural resources used will be obtained here in Montana which will further help our economy. C275

As a member of Electric City Power Inc., I can see the potential benefits to local government, schools, medical facilities and businesses who will sign on to use Great Falls' portion of the power. The use of 65 megawatts of cost based electricity from the HGS will mean less taxes, medical costs and direct economic advantages. Securing an affordable dependable cost based price of electricity will enhance the recruitment of business to Great Falls and reinforce the competitiveness of existing business customers. C306

Response: Thank you for your comments.

12. *The tax revenues for Cascade County in Great Falls are huge. And the burden it would take off of us would be enormous. It allows us stable electrical costs into the future. Something that we cannot predict now. C115*

I've lived near the coal-fired power plants at Colstrip my life. I've lived there four generations, started at Colstrip 3 and 4. I have not noticed any adverse effects. It has been a boon. I personally would have liked to have seen this power plant that is being proposed here down in my home county. And you know why, because of the tax benefits, the property tax benefits are huge. If you look around today, Rosebud County has the lowest property tax paid by any county in the state. Why? Because of Colstrip. And these people are going to have a very big boon in property tax relief when this plant goes into effect. C139

I would like to bring up the long-term electricity rates that will be available because of this plant. I haven't heard much mention of that. I do believe that, because of the stability of this power production, the long-term rates will be very valuable in attracting

new business to Great Falls. So economic development is a good, positive thing from that. C148

Response: Thank you for your comments. Tax revenues from HGS would include property taxes from the plant and income taxes from increases in direct and indirect employment.

- 13. Although there isn't any real "economic impact statement" or "cultural and demographic impact statement" associated with this project, we need to know more about these things, and have these effects investigated by some impartial research group which is not in the pay of SME or the City of Great Falls. These issues are mentioned and largely passed over in the DEIS, which is contrary to the intent and purpose of most of the major environmental policy legislation of the past four decades. C134*

Response: Economic, cultural and demographic issues are addressed in all EISs to varying extents, including in this EIS (Section 4.15). The degree or level of detail to which these issues are analyzed depends on the nature and scope of the proposal and the degree to which these issues are expressed as a concern by agencies and the public.

- 14. Montana's long-term economy lies in tourism, agriculture, and timber. Building another coal powered generating plant will harm these traditional Montana businesses. Global warming worsened by building the Highwood plant will affect the rancher and farmer when prolonged drought and severe summer temperatures reduce the high plains to desert. When the glaciers have melted in Glacier National Park and visibilities are reduced to five miles or less due to smog, will tourists still come to Montana? C248*

Response: The EIS cites concerns that climate change is likely to adversely affect Montana's environment and resources, and every source of greenhouse gases potentially contributes to this impact. However, such impacts are a function of global greenhouse gas emissions. The HGS, if built, would constitute on the order of 0.008 percent of the world's current CO₂ emissions. Thus, the influence of this one plant would be minor and it should not affect Montana's ability to attract tourists to its natural features.

EJP-1700 ENVIRONMENTAL JUSTICE/PROTECTION OF CHILDREN

1. *Documented cases of an increase in rates of autism and asthma occur with increased levels of emissions, including mercury and particles. The preponderance of evidence supports the conclusion that emissions from this plant will harm children and fetuses. Long-term economic consequences will far out weigh any possible economic gains and, therefore, qualify as “disproportionately adverse risks.” C8*

As recently shown in the Steubenville Ohio study, mercury disproportionately settles locally. Federal Agencies are required to examine possible disproportionate impacts on children and on minority and low income populations. Children are clearly disproportionately affected by mercury pollution. C20

As designed, the Highwood Project would needlessly threaten public health, especially the health of our citizens most at risk and least capable of protecting themselves--our children and the elderly. C81, C167, C168, C170

In recent years much has been revealed about the relationship of mercury and autism. There now seems to be little doubt that mercury absorbed by a pregnant woman settles in the uterus and from that condition, the primary cause of autism occurs. (Reference – A highly regarded pathologist – Dr. Cheryl Reichert) Yes, I have observed autism first hand. My twin granddaughters both suffer from this affliction....I ask, is there any proponents that would want to shoulder the responsibility of even one child contracting this dreadful condition because the most up-to-date technology was not used in the building & operation of this proposed coal burning plant. C269

Response: The emissions limitations imposed on the HGS in its air quality permit would prevent significant, adverse air pollution in the vicinity of the plant that would cause significant health problems such as autism and asthma. The Clean Air Mercury Rule and newly approved state mercury rules will reduce mercury emissions in Montana by approximately three-quarters over the next two decades. Not providing economically affordable electricity to rural populations would have its own disproportionately adverse effects, some of which could affect human health.

2. *Adverse effects on the indigenous people of Rocky Boy and other downstream reservations are not addressed in the DEIS, as evidenced, in part, by the stated concerns of numerous Native Americans. C8*

The Rocky Boy Indian Reservation with a population of several thousand Native Americans is directly downwind and downstream from the proposed coal plant. Inhabitants of the Reservation have registered their strong opposition to the coal plant, as evidenced by their written testimony and by hundreds of signatures on the petitions opposing the coal plant. C20

According to the Emissions Inventory, there will be 46 pounds (per year) of mercury that will enter the air, the air that which we breathe....Now! I love my baby brother he has

asthma, and I don't want him to suffer anymore than he is already. And I am very concerned for my future nieces and nephews! And the saying Big Sky will be lost. The future of Montana will be a waste! C185

I worry for my elders who already have health problems. As it is now our tribe is working hard on trying to care for our elders. I worry because they are our culture. We still need time with them to preserve our traditional way of life. Why should we lose our elders to something we will never benefit from? It is a scary thought to me. I want to keep living my traditional ways with my grandparents, parents, friends and family. C189 I am opposed to this [coal plant] because I live in Rocky Boy Reservation and if this plant is built we are the ones going to get the emissions from the coal being burned. I know quite a few people with breathing problems. I would really hate to see them suffer from some one else's benefits. I am sure there are other people off of the reservation that can agree with me when I say that we do not deserve this kind of unthoughtfulness. C192

I am opposed to the coal plant because of the impact on health and the environment. My mother lives in Fort Belknap. She is afflicted with COPD which makes breathing [difficult] under normal circumstances. If the plant operates as scheduled the Rocky Boy and Ft. Belknap reservations will be in the direct path of the air pollution caused by the burning of coal. C193

I was shocked and shaken at the hazardous materials & pollutants that are released into the atmosphere. First of all, I live North of the proposed building site and the toxins will blow over and be deposited on my reservation which will contaminate the land, water and my children. I'm very opposed to the power project as I love my home land & water and my children and the health hazards cannot be measured in dollars. The future effects on our generations to come cannot yet be measured. C195

Here on the Rocky Boy Reservation, we have always called this "God's Country." When and if this coal plant is approved, here in "God's Country," we will be subjected to carbon dioxide, a killer. We will be subjected to gray skies. We will also be subjected to the smell of nothing pure. We have the cleanest air and the most beautiful smells in all of Montana, and that will come to a halt if the coal plant is approved since the winds generally blow towards the Rocky Boy Indian Reservation. C198

Our reservation is downwind from where they're planning to have this power plant, meaning that we'll get a good portion if not more of their harmful pollutants, that will go not only to our lakes and streams but onto our land and into our people. With that happening it contaminates most if not all of our wildlife and their habitat; it will get to our children and to countless generations to come. C201

As a young girl growing up on the Rocky Boy Reservation, going fishing to me was being able to bring it home to cook. Anyone who loves to eat fish knows what I am saying. Now, with all the pollution, it makes me sad that generations of children and after me have to worry about mercury and other toxins in their environment. It discomforts me

that my children and their children will be living with all the pollutants covering the reservation. Something must be done to stop this proposal. C207

WHEREAS, according to wind row studies, the wind is blowing northeast 92% of the time and Rocky Boy's Reservation is northeast and down wind from the proposed coal-fired power plant from where the mercury will be emitted in to the air and falls back to the earth in rain or snow and accumulates in microorganisms that live in the water, as well as plants eaten by livestock and wild game, and....THEREFORE BE IT RESOLVED, that the Chippewa Cree Business Committee hereby oppose the coal-fired power plant to be located near Great Falls, Montana due to health concerns of the Rocky Boy's Indian Reservation. C277

The Fort Belknap Indian Community strongly objects to this coal-fired plant being built for five southern rural electric cooperatives and Electric City Power, Great Falls, MT. Why should three Native American Indian Reservation (Rocky Boy, Fort Peck, and Fort Belknap), on the Highline suffer the environmental impacts associated with coal-fired plants to our pristine air quality? C320

Response: Air quality modeling using state of the art computer models indicates that any changes in air quality in the vicinity of the Rocky Boy Reservation would be negligible. Therefore, there would likely be negligible impact to the reservation. In addition, there would be no to negligible impact on the Missouri River's water quality and quantity from the construction and operation of the HGS.

3. *In regards to children (only in the aspect of educational funding or neglect), would SME ever protest property taxes, denying school districts vital funds and indirectly effecting the quality of education for our children? C80*

Response: This comment is considered outside the scope of the EIS analysis. It is expected that SME would contribute significant tax dollars to the local economy through property taxes, payroll taxes and other fees and taxes associated with HGS. However, RUS and DEQ cannot know whether SME would ever protest any particular tax assessment.

4. *This plant is in Great Falls, and we wanted it in our area in southern Montana, but we did not have the water that it needed, because our tribe right now has an agreement. They have a water compact agreement with the State of Montana. So it would be difficult for this plant to get water from our tribe, because it would take years and years to negotiate. And Great Falls had their water coming from the Missouri, so they got the plant. And they're going to get the jobs, the economic development. Somebody had to get it, because we need this electricity at the lowest cost that we can get it for our Native Americans also. They're low income. C140*

We've heard testimony this evening that there's been no consideration given to traditional cultures or traditional cultural properties, no consideration given to American Indians. I would like to address that issue, if I could. Yellowstone Valley Electric serves a very

large area of the Crow Indian Reservation, this includes the town of Pryor, Montana. In fact, we serve about 1100 Native Americans in that area. These people are members of Yellowstone Valley Electric Cooperative. They've told us that many of them are fixed economic residences and they need low, stable, and reliable energy, cost-base rates. They will benefit from the power produced by this plant. And as members of Yellowstone Valley Electric they will be owners of this plant. C161

Response: Thank you for your comments.

5. *What would you rather have a choice on...Infant Deaths or Money? I don't want to see my baby family members die because some people think its better to have money then a life. C183*

Montana itself does not need to be harmed by metallic minerals and such. No person should have to suffer from money hungry people. Greed should not leave the environment into nothing but waste. C184

There are many reasons why I don't want the coal plant built in Highwood. One is that I'm Native American and we as native people respect the earth. We treat it as we would our mother. And I don't think anyone in the right mind would be polluting their own family. Also the burning of coal is the most polluting way to generate electricity. C186

The HGS is a disaster waiting to happen....Not only is it a dangerous and poorly thought out plan, but a biohazard that will affect the people, their health, the environment and surrounding communities. C187

There is going to be a lot of people suffering from the [power plant]. The people that are going to have babies with deformities. I really feel bad for them. Like that could be any one of us me or you. Imagine I would just die if it happened to me. I think really that's the worst reason for building a plant around here or really anywhere for that matter. C188

I am 19 years old and an enrolled member of the Chippewa-Cree Tribe....Growing up in North-Central Montana was a joy. Playing outside without a worry. Breathing the fresh air and swimming in the mountain creeks. I had a special childhood. My parents never had to worry about the environment affecting my health. From this I would like to say that I want my family to grow up the same way. I don't want to worry about my daughter is breathing when she is outside. C189

This plant can do no good for the people or for the earth. It will slowly but brutally kill our environment and the human race....It is so sickening to hear what this plant can do to us. I can harm our poor defenseless babies who cannot defend themselves. A mother can do everything right when she is pregnant and it still would not matter because of something she ate or something in the air that came from this plant that damaged her child. Her child could have learning difficulties or even die from the pollutants. C190

It appalls me to think that these people would want to put up a power plant that is more harmful to us and the environment. Do they bother to think about the effects this plant will have on our children or our future children? C191

I am a middle age mother of three and I have grandchildren and one more on the way! And I don't want my pregnant daughter or unborn grandchild breathing in any mercury. I don't want my dad or grandson or anyone lese with asthma having to breathe the air with all the chemicals they will put in the air! There are a lot of reasons but those are the main two reasons. C196

After reading the article on the Highwood Power Project, I started to think about the effects it would have on us as Indian People. Indian people, including our tribe the Chippewa Cree Tribe, are already suffering from diabetes, heart disease, alcoholism, drug abuse, and fetal alcohol syndrome. Now, with this proposed coal plant, we will suffer more health problems. C198

I don't want to be screaming racism or being called a racist, but I can also paint that picture. Ever since Columbus came to this country the conquerors always did use disease to kill our people. I see the coal fired generating plant as another way to kill our people and make us further dependent on the government. C198

The pollutants coming out of plants get not only into our waters, but onto our land and into our people....we won't be able to teach our children and generations to come the tradition and fishing and hunting because our wildlife will be contaminated with this methyl mercury. We will no longer be able to eat our own wildlife as our ancestors once did....Being Native American it is our tradition to eat fish and dry meat and other miscellaneous foods that come from our wildlife. C201

I am a student at Stone Child College of Rocky Boy Reservation. I have grew up here in Rocky Boy my whole life. I do not want to see future generations robbed of blue skies and clean water, which I take for granted. C202

When I thought about how many things we do outside and how much we have to cut down on just so we can try our best on keeping healthy I love to go out and do things with my baby, like go for walks, play out side with her, and how I would have to go way out of my way just to go and have fun with her, I am not the only one that has to cut down on things, there are farmers that go out side everyday and there are guys that go hunting would have to stop because everything that is in the air, water, and wheat. They do not go hunt just for them self they give the meat to everyone that needs it. There are lots of people around here that don't got money for food and they depend on people giving them some meat. I can see why they would want to build a power plant, because they have family and they need food, but they make enough for them to have a good health plan, but there are lots of us that don't and we need that money so we can get our kids things and I know that the money that they will get most likely have to save so they can move out of here so they can have the healthy family that they want. I just need to know why they would want to make something that can destroy so many people and animals. C203

I am writing on behalf of my six children, along with other members of my family, who wish to oppose the building of any coal plant especially in our local area, the city of Great Falls. Mainly because this proposed Great Falls coal plant will affect the well being of my children's future, regarding future health concerns. Besides this coal plant will need to be operated with a lot of water we don't have. I'm also worried about the mercury pollution in Montana's lands, air and water. C268

Response: Thank you for your comments.

6. *Under the Montana Governor's American Indian Nation Council Guiding Principles: In formulating or implementing policies, agreements, cooperative grants, activities of any nature, or administrative rules that have direct Tribal implications, the following principles should be considered. 1. Establish and preserve harmonious Tribal/State relationships. 2. Strive for mutual understanding and respect for the sovereign Tribal and State governments. 3. Work cooperatively when the rights of one government to the other are unclear or would result in harm to either government's citizens.*

Response: RUS formally initiated consultation with nine tribal organizations – Blackfeet Tribal Business Council, Crow Tribal Council, Chippewa-Cree Tribal Council, Fort Belknap Community Council, Fort Beck Tribal Executive Board, Little Shell Tribe of Chippewa Indians of Montana, Northern Cheyenne Tribal Council, and the Montana-Wyoming Tribal Leaders Council -- with a January 20, 2006 letter describing the proposed power plant. These letters were followed up by phone calls to each of these organizations. Language from the Montana Governor's American Indian Nation Council Guiding Principles has been added to Issue 14 on Environmental Justice and Protection of Children in Section 1.6.1 of the FEIS.

CUM-1800 CUMULATIVE IMPACTS

1. *Table 5-1 is a summary of direct and indirect impacts associated with the various options. This table appears to address only the plant site area and leaves out the plant's impact on the surrounding area. The 400-foot stack SME plans to build conveniently disperses the pollutants from the power plant far and wide. Table 5-1 is misleading because it does not address the entire dispersal area. The Soils, Topography, and Geology section should include irreversible adverse soil impact from mercury, lead, and other heavy metal releases. Potential acid rain harm to forests within the dispersal area should be documented. C50*

Response: The impact analysis in Chapter 4 did not identify irreversible adverse soils impacts from mercury, lead and other heavy metals releases. Nor were acid rain impacts to forests identified. Therefore, they are not summarized on Table 5-1.

2. *The cumulative effects of the Great Falls' refinery's air discharges, the new malting plant, 10th Avenue South vehicular traffic, the west bank linseed oil plant, and Malmstrom coal plant (formerly they were burning oil) need to be considered in this application and in the DEIS in a comprehensive way with appropriate studies and actual test measurements so that we will know what is actually happening here. C78*

Response: With all the major and minor emissions sources in the Great Falls area, the area is still in attainment with NAAQS and MAAQS. Ambient air quality samples from Great Falls and the surrounding area are compiled in Table 3-5 of the EIS. The data show that ambient air quality in the area, with the existing sources operating, is well below the NAAQS and MAAQS. SME submitted modeling to estimate the combined impacts of all existing and proposed emission sources. The sum of the modeled impacts and the existing ambient concentrations shows that predicted concentrations will be well below the NAAQS and MAAQS.

3. *What effect would a proposed transmission line from Canada to Great Falls have on the energy grid and SME? C80*

Response: The Great Falls substation would have to be enlarged to handle the additional energy and there would have to be additional outgoing transmission lines.

4. *This DEIS must consider the cumulative effects that local deposition of mercury could have on Montana's already mercury impaired waterbodies and the public that relies on those waters for subsistence. C95, C134*

Response: According to the analysis in Section 4.5.2.2.4, mercury emissions from the HGS would be primarily in the form of elemental mercury, which is readily transported long distances through the atmosphere. It is likely that there would be minimal local deposition of mercury from the HGS in Montana's water bodies, although there have been recent indications that local deposition of mercury from industrial sources, in general, may be a greater concern than once was thought. The

primary source of mercury in these water bodies is believed to come from the global pool of atmospheric mercury with a significant contribution by overseas power plants. Pursuant to new federal and state mercury rules, mercury emissions from Montana power plants will be required to drop by three-quarters, although that probably will not equate to a similar drop in deposition given the likely source of most of our deposited mercury.

5. *How much additional carbon dioxide will be added by the two trains that come to Great Falls each week? This needs to be added to the cumulative affects from greenhouse gases. Another area that needs to be looked at is the cumulative effects of increased power costs. In addition to the costs associated with development of coal there are also costs to reclaim the lands disturbed by coal strip mining. This takes additional diesel fuel which in turn increases the carbon dioxide emitted. The cumulative affects need to consider coal mining and coal shipping as well as coal burning. C104*

Response: Thank you for your comment. A statement to this effect has been added to the FEIS.

6. *Page 5-11, first paragraph, fourth and fifth lines. The DEIS states that “coal-fired power plants are now the remaining emitter of mercury in the U.S.” Based on what analysis? There are many “remaining” sources of mercury emissions in the U.S., which include coal-fired power plants. C128*

Response: This statement has been reworded to make it clearer. Coal-fired power plants constitute the main single source of mercury emissions in the U.S. See Figure 3-22 for clarification.

7. *Page 5-13, Proposed Coal-fired Power Plants Section. Please note that the Otter Creek Project is speculative and has not submitted an air quality permit application or otherwise formally announced its size, location, etc. Therefore including it in this list of proposed plants is not appropriate. Further, the reference to Rocky Mountain Power near Hardin has an incorrect megawatt rating – the air quality permit for RMP lists the unit at 113 MW. C128*

Response: The Otter Creek Project fits the definition as “conceptualized” as stated in the subject paragraph. Including it is therefore appropriate. The megawatt rating for RMP has been corrected.

8. *With all the proposed power plants I’m concerned with cumulative pollution & water supply. C238*

Response: Chapter 5 of the EIS looks at cumulative impacts for both air pollution and water supply. In addition, the air quality analysis in Chapter 4 looks at the local cumulative effects of the HGS and all other emissions sources in the Great Falls area. These analyses conclude that cumulative effects on both air quality and water quantity from the HGS would not be significant.